

EXHIBIT 1

EXHIBIT 1

Exhibit 1 is a spreadsheet breaking down Starbucks' proposed reductions to CML's attorneys' fees in accordance with the lodestar analysis. The spreadsheet is organized into four tabs (or categories):

- (1) Reducing Fees for Entries Before This Court Issued its Opinion Granting Partial Summary Judgment in Favor of Starbucks on 8/31/22 to Account for CML's Time Spent of Claims that were Dismissed at the Summary Judgment Stage**
- (2) Reducing Fees for Block Billing Entries**
- (3) Reducing Fees for Vague Entries**
- (4) Reducing Excessive Fees**

DESCRIPTION OF EACH TAB:

(1) *Pre-Summary Judgment Reductions* – Starbucks requests reducing all fees entered prior to 8/31/22 (when the summary judgment opinion was issued) by 62.5% (5/8%), representing the fact that 5/8 of Ms. Phillips' claims (retaliation and failure to hire claims) were dismissed at the summary judgment stage

- **Entries in Fuchsia** = Block billed Entries, which Starbucks requests be further reduced by 50% (see Tab 2)
- **Entries in Red** = Vague Entries, which Starbucks requests be removed entirely (see Tab 3)
- **Entries in Purple** = Excessive billing, which Starbucks requests be reduced by 1/3 (see Tab 4)

(2) *Block Billed entries* – Starbucks requests reducing all block billed entries by 50%

- **Entries in Red** = Vague Entries, which Starbucks requests be removed entirely (see Tab 3)
- **Entries in Purple** = Excessive billing, which Starbucks requests be reduced by 1/3 (see Tab 4)

(3) *Vague Entries* – Starbucks requests that all vague entries be removed entirely

(4) *Excessive Billing* – Starbucks requests reducing excessive fees by 1/3

TAB 1

| Staff | Duration | Rate | Billable Amount | Description | Proposed Reductions (Hours) | Proposed Billable Amount Reductions | Proposed Billable Amount Post Reduction |
|-------|----------|-----------|-----------------|--|-----------------------------|-------------------------------------|---|
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Review, analyze and respond to email from Judge Slomsky's chambers; exchange emails with trial team and economic loss expert regarding scheduling of hearing | | | |
| LCM | 0.3 | \$ 870.00 | \$ 261.00 | Post trial work. Emails to and from trial team regarding the Econ loss hearing. Review emails from opposing counsel regarding the same. Communications with Holly regarding economic loss hearing. Telephone conference with client regarding economic loss hearing. Emails to and from trial team regarding the same. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with OC, telephone conference with Laura, File Review. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Post trial work. Send letter to Judge regarding status of case and econ loss hearing. Review letter from opposing counsel to judge in regards to economic loss hearing. Prep work for econ loss hearing. | | | |
| SGC | 0.8 | \$ 960.00 | \$ 768.00 | telephone conference with Laura, telephone conference with client. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura. | | | |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Prepped for and attended telephone hearing with court | | | |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Participate in elephone conference with Court | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Telephone conference with court regarding status of case and next steps. Debrief with trial team regarding call with court. Telephone conference with client regarding the same. | | | |
| SGC | 0.7 | \$ 960.00 | \$ 672.00 | telephone conference with Laura. | | | |
| HS | 7.5 | \$ 240.00 | \$ 1,800.00 | Attended trial; post-verdict meeting with client; post-verdict telephone conference with Steve | | | |
| KCO | 7.5 | \$ 520.00 | \$ 3,900.00 | Support and assist lead trial counsel at trial (jury charge, deliberations, client meeting post verdict re: next steps); | | | |
| LCM | 7.5 | \$ 870.00 | \$ 6,525.00 | Jury instructions, deliberation, verdict. Conferences with client and Steve. Review courts order on Plainosmotion for sanctions. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Calls with Steve regarding trial debrief and settlement talks. Communications with Expert regarding trial and Econ lost hearing. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura, Text to/from Kate | | | |
| HS | 1 | \$ 240.00 | \$ 240.00 | telephone conference with Steve regarding trial; teams messages with trial team regarding trial | | | |
| LCM | 2 | \$ 870.00 | \$ 1,740.00 | Calls with Steve regarding trial debrief and settlement talks. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura. | | | |

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|-----|------|-----------|--------------|--|--|--|--|
| HS | 8 | \$ 240.00 | \$ 1,920.00 | Attended trial; trial prep before and after | | | |
| KCO | 8 | \$ 520.00 | \$ 4,160.00 | Support and assist lead trial counsel at trial | | | |
| LCM | 12 | \$ 870.00 | \$ 10,440.00 | Trial and preparation before and after. | | | |
| HS | 13 | \$ 240.00 | \$ 3,120.00 | Attended trial; Trial prep before and after; reviewed and revised Court's proposed jury instructions and verdict sheet; emails and phone calls with Laura regarding same; reviewed admitted exhibits and made index for submission at close of Plaintiff's case in chief | | | |
| KCO | 10.6 | \$ 520.00 | \$ 5,512.00 | Support and assist lead trial counsel at trial | | | |
| LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to and from opposing counsel regarding net worth stipulation. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone conference with Laura; Texts to/from attorneys, Holly and Kate. | | | |
| HS | 12 | \$ 240.00 | \$ 2,880.00 | Attended trial; trial prep before and after trial | | | |
| KCO | 10.5 | \$ 520.00 | \$ 5,460.00 | Support and assist lead trial counsel at trial; telephone conference with trial team re strategy for next day; draft cross Camille Hymes and Zeta Smith summaries/goals | | | |
| LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to, and from opposing counsel regarding witness order and punitive damages net worth stipulation. Emails to and from Expert regarding econ loss hearing. Review email from opposing counsel regarding defendants response in opposition to motion for sanctions and renewed motion for in limine. | | | |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Laura re. Trial. | | | |
| HS | 17 | \$ 240.00 | \$ 4,080.00 | Attended trial; trial prep before and after trial; reviewed surveillance footage produced by Defendant on 6/6; communicated with trial team regarding same; telephone conference with Steve regarding trial | | | |
| KCO | 12 | \$ 520.00 | \$ 6,240.00 | Support and assist lead trial counsel at trial; messages related to late produced videos; review videos | | | |
| LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to and from opposing counsel regarding Zeta Smith's availability to testify. Review email from opposing counsel regarding new surveillance video. | | | |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Holly. | | | |
| HS | 12.5 | \$ 240.00 | \$ 3,000.00 | Attended trial; Trial prep before and after trial; legal research regarding mixed-motive standard and Erickson case; drafted letter to Court regarding jury instructions; emails and phone calls with Laura regarding same | | | |

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|-----|------|-----------|--------------|---|--|--|--|
| KCO | 11.1 | \$ 520.00 | \$ 5,772.00 | Support and assist lead trial counsel at trial; review and analyze testimony and documents; continue to draft cross Camille Hymes | | | |
| LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone conference with Laura. | | | |
| HS | 12 | \$ 240.00 | \$ 2,880.00 | Drafted motion for sanctions/renewed MIL; telephone conferences with Kate and Laura regarding same; revisions to same; telephone conference with Laura regarding trial strategy | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Trial prep; exchange multiple communications with Laura C. Mattiacci, Esquire; exchange multiple communications with client; review, analyze and revise draft motion; multiple telephone conferences with Holly Smith, Esquire regarding same. | | | |
| LCM | 14 | \$ 870.00 | \$ 12,180.00 | Trial prep. Final preparation for trial, including finalizing, opening, power, points, evidentiary arguments, cross examinations. Communications with Holly regarding the YouTube video and renewed motion for preclusion. Meeting with Shannon to prepare for direct/cross examination. Communications with Holly regarding motion for sanctions. Review and revise motion to preclude videos, and motion for sanctions. | | | |
| HS | 4 | \$ 240.00 | \$ 960.00 | Reviewed surveillance videos; legal research for motion for sanctions/renewed MIL | | | |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Trial prep; review, analyze and respond to multiple messages from Laura C. Mattiacci, Esquire | | | |
| LCM | 12 | \$ 870.00 | \$ 10,440.00 | Trial prep. Final preparation for trial, including finalizing, opening, power, points, evidentiary arguments, cross examinations. Review and deep digest video clips produced by descendent from surveillance video. | | | |
| HS | 9.8 | \$ 240.00 | \$ 2,352.00 | Trial prep; met with client and trial team to prep client for her testimony; reviewed video clips; emailed with trial team and Steve Console regarding strategy for motion for sanctions/renewed MIL | | | |
| KCO | 9 | \$ 520.00 | \$ 4,680.00 | In person trial prep with client; prepare client for direct examination; review and analyze late production by Defendant; exchange messages with trial team regarding strategy for dealing with same | | | |

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|-----|------|-----------|-------------|---|--|--|--|
| LCM | 10.5 | \$ 870.00 | \$ 9,135.00 | Trial prep. Emails to and from opposing counsel regarding defendant witness availability. Review and revise timeline. Prep session with plaintiff to go through entire direct and cross examination questions. Review filings by defendant regarding YouTube video. Review email from opposing counsel with numerous clipped versions of surveillance video. | | | |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | Texts to/from Laura. | | | |
| HS | 6 | \$ 240.00 | \$ 1,440.00 | Trial prep; reviewed deposition transcripts of Hymes, Smith, and Pinto; reviewed documents; reviewed rebuttal documents; legal research on issues decided at final pretrial conference; prepared for client's prep session | | | |
| KCO | 4 | \$ 520.00 | \$ 2,080.00 | Trial prep; review and analyze trial exhibits; review and analyze deposition (video and transcript) of Paul Pinto; internal conference regarding trial strategy; telephone conference with expert witness; draft expert direct examination; exchange Teams and text messages with Laura Carlin Mattiacci, Esquire regarding testimony and direct examinations; review and analyze correspondence regarding Zoom link from opposing counsel; review and analyze correspondence from Laura C. Mattiacci, Esquire regarding same | | | |
| LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Telephone conference with opposing counsel, recording order of witnesses. Emails to and from opposing counsel regarding witness availability. Create list of rebuttal documents, and other needed documents that were not marked as trial exhibits. Continue to work and ever law to review documents produced in the case. communications with Kate regarding examination of experts. Telephone call with Expert regarding trial. Communications with Alexis regarding rebuttal docs and index. Review and revise and send letter to court regarding defendants unilateral request for a zoom link to the trial. | | | |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Laura. | | | |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Attended in-person trial prep with client, Kate, and Laura | | | |
| KCO | 5 | \$ 520.00 | \$ 2,600.00 | Prepare for and participate in in person prep session with client for trial; internal communications with Laura C. Mattiacci, Esquire regarding witness prep, witness order. | | | |
| LCM | 8 | \$ 870.00 | \$ 6,960.00 | Trial prep. Work on trial subpoena issues. Continue to work on cross-examinations. Emails to and from opposing counsel regarding Camille Hymes and the stamped trial exhibit errors on defendants list. Review email from opposing counsel to Judge regarding synopsis of Angela grass is testimony. Prep session with client. | | | |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone call with Laura. | | | |

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|-----|-----|-----------|-------------|--|--|--|--|
| HS | 4 | \$ 240.00 | \$ 960.00 | Prepped for final pretrial conference; Travelled to/from and attended final pretrial conference | | | |
| KCO | 4 | \$ 520.00 | \$ 2,080.00 | Continue to do research and analysis of expert impeachment/rebuttal information; prepare for, travel to/from and attend Joint and Final Pre-trial conference; continue to review and analyze timeline for inclusion in direct examination; | | | |
| LCM | 8 | \$ 870.00 | \$ 6,960.00 | Trial prep. Prepare for and attend Final Pretrial Conference. Work on creating enlargements for trial, review and revise organizational chart, review and revise other enlargements of key exhibits. Continue to work on cross-examination's and keeks of a list. | | | |
| SGC | 2 | \$ 960.00 | \$ 1,920.00 | File Review | | | |
| HS | 2 | \$ 240.00 | \$ 480.00 | Drafted summaries of motions to be argued at final pretrial conference | | | |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Exchange messages with Laura C. Mattiacci, Esquire regarding trial; draft and send multiple emails to expert regarding trial; research and analysis of prior case involving our expert on Lexis Advance; | | | |
| LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review stamp trial exhibit list by opposing counsel, compare with our list. Continue to review and revise cross examination, opening and closing statement. Review final pretrial conference binder. Communications with trial team regarding call with Expert. Review motion, in limine summaries in preparation for pretrial conference. | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Further research and analysis on 701/702 issues; draft memorandum regarding same; team trial strategy messages in Teams | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting re next steps and trial strategy. | | | |
| KCO | 0.9 | \$ 520.00 | \$ 468.00 | Research and analysis of FRE 701 on opinion testimony | | | |
| LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review and revise direct exam of plaintiff and questions for cross. deposition review of key witnesses for cross-examination and update drafts. | | | |
| HS | 2 | \$ 240.00 | \$ 480.00 | Attended zoom trial prep with client, Kate, and Laura; internal conference with Kate and Laura regarding trial strategy | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Zoom preparation with client, Laura C. Mattiacci, Esquire and Holly Smith, Esquire regarding trial; internal conference regarding trial prep | | | |

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|-----|-----|-----------|-------------|---|--|--|--|
| LCM | 10 | \$ 870.00 | \$ 8,700.00 | Trial prep. Review and revise direct outline for plaintiff and rough draft of cross questions/issues. Prep session with client for direct and cross examination. Create binder of rebuttal documents. Communications with trial team regarding Trinsey pay issues. Deeper review of documents not marked at depositions. Internet, research of Holly Hylton alleged racist post, none found. Communications with Kate regarding Holly Hylton's posts. Communications with Kates regarding legal research on hypothetical questions. | | | |
| SGC | 2.5 | \$ 960.00 | \$ 2,400.00 | Several telephone conference with Laura, Review emails, telephone conference with with Holly. | | | |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Trial preparation; review and analyze file for specific documents and facts for use at trial; exchange multiple messages with Laura C. Mattiacci, Esquire regarding trial strategy | | | |
| LCM | 10 | \$ 870.00 | \$ 8,700.00 | Trial prep. Continue reading, all documents produced in the case to craft cross examinations. review, and revise direct of plaintiff. Review text messages, and the UTC time translator. Review and revise exhibit list, communications with opposing counsel regarding revised exhibit list. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Trial preparation; review and analyze text messages from exhibit lists; draft chart of same for use at trial; exchange messages with Laura C. Mattiacci, Esquire regarding documents for use at trial; further develop rebuttal arguments | | | |
| LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial prep. Review and revise timeline and key exhibit list in preparation for client direct examination prep. | | | |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | Trial prep; exchange text messages with client; review, analyze and respond to Teams messages regarding case from Laura C. Mattiacci, Esquire; review and analyze documents | | | |
| LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Communications with Alexis regarding filing of verdict sheet. Communications with trial team regarding preparation for pre-chalk conference. communications with Holly regarding outline of motion in limine arguments. emails, with opposing counsel regarding pretrial filings and preparation for pretrial conference. Work on opening and closing. Communications with Kate regarding text message chart and unemployment compensation application. | | | |

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|-----|------|-----------|-------------|--|--|--|--|
| HS | 11.5 | \$ 240.00 | \$ 2,760.00 | Trial prep Teams meeting; Revised and finalized jury instructions, verdict sheet, and voir dire; Drafted opp to Starbucks' motions in limine; revised same | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Review, analyze and revise opposition to motion in limine; Teams meeting with Laura C. Mattiacci, Esquire and Holly Smith, Esquire regarding opposition to motion in limine and trial strategy; review and analyze Defendant's opposition to Plaintiff's MIL and Rule 37 motion; coordinate filing of Plaintiff's response to Defendant's motion in limine | | | |
| LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Communications with Holly regarding the pretrial documents and legal issues concerning the various jury instructions. Review and revise plaintiff's response to defendants motion in limine. Teams call with Tretina to discuss planus response to defendants motion in limine. Work on cross-examination, opening statement, PowerPoint slides. Emails to and from opposing counsel regarding voir dire and other pretrial filings. | | | |
| HS | 6.5 | \$ 240.00 | \$ 1,560.00 | Drafted opp to Starbucks' motions in limine | | | |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Trial preparation regarding exhibits; trial team meeting regarding strategy for opposition to motion in limine | | | |
| LCM | 8.5 | \$ 870.00 | \$ 7,395.00 | Trial prep. Continue to work on key docs for trial. Review and revise cross examinations. Teams meeting with trial team regarding the Sykes/Trinsey trial testimony. Internet research regarding the 911 call another background information concerning the arrests. Review and revise pretrial documents, email pretrial documents to opposing counsel. | | | |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Drafted and revised jury instructions, voir dire, and verdict sheet | | | |
| LCM | 0.5 | \$ 870.00 | \$ 435.00 | Trial prep. Communications with Holly regarding voir dire revisions. | | | |
| HS | 4.1 | \$ 240.00 | \$ 984.00 | Trial prep teams meeting; Prepped for final pretrial conference; | | | |
| KCO | 3 | \$ 520.00 | \$ 1,560.00 | Trial meetings to discuss status and strategy for verdict sheet, MILs, jury instructions; meet and confer with opposing counsel regarding same; continue to draft direct | | | |
| LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review and revise the verdict sheet, jury instructions, and voir dire. Communications with Holly regarding the same. communications with Holly and Kate regarding the New Jersey "reverse race" SJ standard. Meet and confer with opposing counsel concerning pretrial filings. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone conference with Laura re. economic report. | | | |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Telephone conference with Holly Smith, Esquire; trial preparation | | | |

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|-----|------|-----------|-------------|--|--|--|--|
| LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review drafts of voir fire, jury instructions, and Verdict sheets. Communications with Holly regarding questions about the jury instructions. Continue working on opening statement, demonstrative exhibits, and PowerPoint. Teams meeting with Trial team regarding pretrial filings. | | | |
| LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial prep. Communications with Alexis and Holly concerning drafts of pretrial filings, verdict sheet, voir dire. | | | |
| LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review, defendants, motion, in limine, and legal research regarding the same. discussions with trial team regarding defendants motion, in limine and other evidentiary issues regarding trial. | | | |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | File review. | | | |
| HS | 12 | \$ 240.00 | \$ 2,880.00 | Drafted motion in limine; drafted motion to exclude Rose and Grass; revisions to same | | | |
| KCO | 1.2 | \$ 520.00 | \$ 624.00 | Review and revise motions in limine; review and revise Rule 37 motion; telephone conference with Holly Smith, Esquire regarding same | | | |
| LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Communications with Holly regarding draft omnibus motion in limine. Communications with Holly regarding defendant's undisclosed witnesses. Legal research regarding MIL issues. Review final motion, in limine packet for filing. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone conference with Laura. | | | |
| HS | 10.5 | \$ 240.00 | \$ 2,520.00 | Drafted and revised motion to exclude Grass and Rose; Drafted and revised omnibus motion in limine | | | |
| LCM | 5.5 | \$ 870.00 | \$ 4,785.00 | Trial prep. Review all filings concerning defendants motion for reconsideration and the courts denial of the same. Communications with trial team regarding denial of motion for reconsideration. Continue to work on outlines of cross examination of key witnesses. | | | |
| HS | 4.5 | \$ 240.00 | \$ 1,080.00 | Conducted legal research for omnibus motion in limine; drafted omnibus motion in limine | | | |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Trial prep; telephone call with client regarding disability benefits | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Communications with Kate regarding disability benefits of plaintiff and plaintiff's expert report. | | | |
| LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Communications regarding motions, in limine with trial team. Legal research and discussions regarding the YouTube clip on defendants exhibit list. Work on draft opening statement. | | | |
| HS | 3 | \$ 240.00 | \$ 720.00 | Multiple trial prep Teams meetings | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Prepare for and participate in trial meetings; begin to research in preparation for motions in limine | | | |

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|-----|-----|-----------|-------------|---|--|--|--|
| LCM | 2 | \$ 870.00 | \$ 1,740.00 | Trial prep. Teams call regarding motions, in limine, and evidentiary issues concerning trial. Review videos of depositions. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone calls with Laura re. Trial. | | | |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Trial prep; reviewed documents and made revisions to timeline | | | |
| LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Work on trial subpoena issues. Create drafts of enlargements for trial. Work on timeline and key documents list. Review deposition transcripts to prepare crosses. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone call with Laura and emails/text to/from attorneys, Holly and Kate regarding Trial issues and strategy. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Communications with Kate regarding supplemental income loss report. Review supplemental Econ loss report. | | | |
| LCM | 8 | \$ 870.00 | \$ 6,960.00 | Review email from Kate regarding expert report. Review expert report. Email and telephone conference with Kate regarding expert report. | | | |
| LCM | 2 | \$ 870.00 | \$ 1,740.00 | Trial prep. Meeting with Holly regarding legal research on the admissibility of Sykes opinion. Continue to work on integrated exhibit and event timeline for trial. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone calls with Laura regarding Trial issues and strategy. | | | |
| HS | 2.6 | \$ 240.00 | \$ 624.00 | Zoom meeting with client, Laura, and Kate regarding trial prep | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Trial prep; review exhibits; reviewed expert report and discussed same with Laura C. Mattiacci, Esquire | | | |
| LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review all expert reports and expert depositions. Communications with Kate regarding tax gross up. Works on draft exams of experts. Teams meeting regarding trial tasks and next steps. Review trial subpoenas for service. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone calls with Laura regarding Trial issues and strategy. | | | |
| HS | 1 | \$ 240.00 | \$ 240.00 | Trial prep teams meeting | | | |
| LCM | 7.5 | \$ 870.00 | \$ 6,525.00 | Trial prep. Communications with Alexis regarding re-organizing all text messages in chronological order. Review binder created by Alexis of all text messages, a messages in the case in chronological order. Makes notes for cross-examinations of witnesses. Research regarding Bellevue Communications and Mustafa Rashed. Continue revising Timeline. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone calls with Laura regarding Trial issues and strategy. | | | |
| HS | 6 | \$ 240.00 | \$ 1,440.00 | Drafted and revised pretrial memo | | | |
| KCO | 1.7 | \$ 520.00 | \$ 884.00 | Trial prep; review exhibits | | | |

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|-----|------|-----------|-------------|---|--|--|--|
| LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial prep. Communications with Holly regarding pretrial memo. Review and revise the pretrial memo. Review and revise exhibits list. Create list of objections to defendant's exhibits. Communications with trial team regarding Ben Trinsey, Holly Hylton and Paul Sykes. Communications with Kate regarding punitive damages. | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone calls with Laura regarding Trial issues and strategy. | | | |
| HS | 3.1 | \$ 240.00 | \$ 744.00 | Drafted pretrial memo | | | |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Trial prep; review, analyze and respond to requests from Laura C. Mattiacci, Esquire regarding exhibits | | | |
| LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Continued review of all documents produced by defendant in the case. Communications to and from Cait regarding the safe and welcoming policy, and other document related questions. | | | |
| LCM | 6.5 | \$ 870.00 | \$ 5,655.00 | Trial prep. Work on pre-trial memo. Communications with Holly regarding pretrial memo. continue working in documents. Partial review all of the documents produced by Defendant. | | | |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Telephone conference with Holly Smith Esquire; draft and send teams message regarding witness | | | |
| LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial prep. Work on witness subpoena issues. Communications with trial team regarding subpoenas. Review and revise org, chart for trial. Review LinkedIn profiles of witnesses. Draft parts of crosses for key witnesses. | | | |
| LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial Prep. Work on exhibits list. Call with Holly regarding trial strategy and exhibits. | | | |
| HS | 1.5 | \$ 240.00 | \$ 360.00 | Trial prep teams meeting | | | |
| KCO | 1.4 | \$ 520.00 | \$ 728.00 | Trial Prep teams meeting | | | |
| LCM | 9.1 | \$ 870.00 | \$ 7,917.00 | Trial prep. Create combination exhibit list from defendants, exhibit and plaintiffs, eliminate duplicates, and re-number. Review videos of depositions. | | | |
| LCM | 10.2 | \$ 870.00 | \$ 8,874.00 | Trial prep. Review documents, marked by defendant has trial exhibit, review and revise timeline. Crosscheck documents with deposition testimony. Communications with trial team regarding exhibit lists. | | | |
| LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial Prep. Work on exhibits list. | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone conference with Kate. | | | |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Drafted materials for exchange with Defendant | | | |
| LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review messages from Holly regarding drafts of her proposed stipulations, dep designations, an exhibit list. Review exchange of trial exhibits. | | | |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Drafted materials for exchange with Defendant | | | |

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|-----|-----|-----------|-------------|--|--|--|--|
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Review and analyze potential trial exhibits; create proposed exhibit universe; exchange emails with expert | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Review potential trial exhibit list. Messages to and from trial team regarding exhibit list. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Review dep exhibits in Everlaw. | | | |
| HS | 1.5 | \$ 240.00 | \$ 360.00 | Teams meeting with Laura and Kate regarding trial strategy and prep; telephone conference with Kate regarding trial tasks and strategy | | | |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Telephone conference with Holly Smith, Esquire; trial preparation meeting | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with trial teams reading tasks and next steps. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with Trial team regarding tasks and next steps. Review SJ briefs. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Review exhibit list, pretrial orders, pleadings. | | | |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Holly | | | |
| HS | 1 | \$ 240.00 | \$ 240.00 | Teams meeting with Laura and Kate regarding trial strategy and prep | | | |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Trial preparation and strategy meeting; timeline | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with Trial team regarding tasks and next steps. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with Trial Team regarding state of Everlaw documents. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Work in Timelines, review potential trial exhibits. | | | |
| LCM | 0.5 | \$ 870.00 | \$ 435.00 | Review and revise plaintiffs opposition to the defendants motion for reconsideration. | | | |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Further, review, analyze and revise draft oppo to motion for reconsideration; telephone conference with Holly Smith, Esquire regarding additional information to include in opposition | | | |
| LCM | 3 | \$ 870.00 | \$ 2,610.00 | Review and revise planus opposition to defendants motion for reconsideration. Internal conference with Holly regarding the same. | | | |
| HS | 1.2 | \$ 240.00 | \$ 288.00 | Teams meeting with Laura and Kate regarding trial strategy and prep | | | |
| KCO | 2.9 | \$ 520.00 | \$ 1,508.00 | Review and analyze client docs; review and revise motion for reconsideration; telephone conference with Holly Smith, Esquire; trial team meeting | | | |
| LCM | 0.5 | \$ 870.00 | \$ 435.00 | Case review meeting with trial team. | | | |
| HS | 3 | \$ 240.00 | \$ 720.00 | Drafted opp to motion for reconsideration | | | |
| HS | 2 | \$ 240.00 | \$ 480.00 | Drafted opp to motion for reconsideration | | | |
| HS | 1.2 | \$ 240.00 | \$ 288.00 | Teams meeting with Laura and Kate regarding trial strategy and prep | | | |

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|-----|-----|-----------|-------------|---|--|--|--|
| KCO | 4.1 | \$ 520.00 | \$ 2,132.00 | Continue to trial prep chronology and review and analyze documents for selection as trial exhibits; meeting with trial team to discuss trial strategy and status; exchange emails with client regarding 2022 earnings | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Weekly trial team meeting regarding strategy, tasks and next steps. | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Quick review of videotaped depositions. Notes for trial presentation. | | | |
| HS | 1.5 | \$ 240.00 | \$ 360.00 | Teams meeting with Laura and Kate regarding trial strategy and prep | | | |
| KCO | 3.1 | \$ 520.00 | \$ 1,612.00 | Continue to prepare for trial; review and analyze documents for inclusion as trial exhibits; meeting with trial team to review deadlines and strategy for meeting same; strategy session with trial team | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura, texts to/from Kate. file review | | | |
| KCO | 1.4 | \$ 520.00 | \$ 728.00 | Continue to prepare for trial; continue to review and analyze documents for selection as trial exhibits | | | |
| KCO | 6 | \$ 520.00 | \$ 3,120.00 | Continue to review and analyze record for updated chronology of events; exchange emails with client; Teams messages with trial team; telephone conference with Holly Smith Esquire regarding opposition for motion for reconsideration. | | | |
| LCM | 6 | \$ 870.00 | \$ 5,220.00 | Read deposition transcripts, draft initial outline for cross examinations. | | | |
| KCO | 9.3 | \$ 520.00 | \$ 4,836.00 | Continue to review and analyze testimony and documents for construction of updated timeline of events for presentation at trial | | | |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | emails to/from attys | | | |
| KCO | 1.9 | \$ 520.00 | \$ 988.00 | Trial prep | | | |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | | | |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Telephone conference with Holly Smith, Esquire regarding motion for reconsideration | | | |
| LCM | 8 | \$ 870.00 | \$ 6,960.00 | Work on reviewing huge number of the discovery documents, meeting with Alona H., and admin team, regarding organization of documents, teams, communications with Kate and Charlie team regarding tasks and next steps. | | | |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Telephone conference with Holly Smith, Esquire regarding extensions | | | |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Exchange emails with Holly Smith, Esquire regarding extensions | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Kate | | | |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Exchange emails with opposing counsel regarding new trial date; further draft letter and order for submission; review and analyze re-filed motion | | | |

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|-----|-----|-----------|-------------|---|--|--|--|
| KCO | 2.1 | \$ 520.00 | \$ 1,092.00 | Telephone conference with Holly Smith, Esquire regarding response to Rule 11 letter, anticipated new filing and strategy for opposing/responding to same; reveiw, analyze and revise draft proposed order; draft letter to Judge Slomsky; circulate same internally for approval; circulate same to opposing counsel for consent; exchange emails with opposing counsel | | | |
| LCM | 0.5 | \$ 870.00 | \$ 435.00 | Emails to and from Kate regarding letter to opposing counsel concerning shifting trial dates. Review and revise letter to opposing counsel. | | | |
| HS | 1 | \$ 240.00 | \$ 240.00 | Teams meeting with Laura and Kate regarding trial strategy and prep | | | |
| KCO | 4.7 | \$ 520.00 | \$ 2,444.00 | Continue to prepare for trial and pre-trial motions/filings by reviewing and analyzing documents produced by either Party in this action; Teams meeting with Trial team to discuss case and trial logistics and strategy | | | |
| LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial team meeting regarding Everlaw, and document organization. Review documents. | | | |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Everlaw review/organization for trial prep; telephone conference with Kate regarding same; Reviewed motion for reconsideration; research and drafting Rule 11 letter | | | |
| KCO | 2.8 | \$ 520.00 | \$ 1,456.00 | Exchange multiple emails with client regarding new motion from Defendant and trial scheduling; review, analyze and further draft Rule 11 letter to opposing counsel regarding latest motion; draft and send email enclosing Rule 11 letter to Rich Harris, Esquire; exchange emails with Rich Harris, Esquire regarding same; begin to prepare or pre-trial filings by review, and analyzing record/documents | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Begin reviewing file, timelines, common or chart. | | | |
| SGC | 0.6 | \$ 960.00 | \$ 576.00 | emails to/from attys; file review | | | |
| HS | 7 | \$ 240.00 | \$ 1,680.00 | Reviewed Defendant's motion for reconsideration; legal research on Rule 60; legal research on Erickson and other cases cited in Defendant's motion; emailed with Steve, Kate, and Laura regarding same; telephone conference with Kate regarding same | | | |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review and analyze motion for reconsideration filed by Defendant; research and analysis of Rule 60; telephone conference with Holly Smith, Esquire regarding strategy for opposition | | | |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Laura | | | |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Teams meeting to discuss trial tasks and strategy. | | | |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | emails to/from Kate , file review | | | |
| HS | 0.4 | \$ 240.00 | \$ 96.00 | telephone conference with Kate regarding settlement conference | | | |

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|-----|-----|-----------|-------------|--|--|--|--|
| KCO | 5 | \$ 520.00 | \$ 2,600.00 | Travel to/from, prepare for and participate in settlement conference before Judge Donio | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conferences w Kate, file review | | | |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze court order; prepare for and participate in telephone conference with Judge Donio regarding defense request to have client appear remotely; telephone conference with Rich Harris, opposing counsel, regarding settlement; exchange text messages with client regarding settlement conference | | | |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Exchange texts with Stephen G. Console, Esquire regarding settlement; telephone conference with Stephen G. Console, Esquire regarding settlement; telephone conference with client regarding same | | | |
| SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with OV, texts to Kate, telephone conference with Kate, file review | | | |
| HS | 8 | \$ 240.00 | \$ 1,920.00 | Drafted settlement conference memo; telephone conference with Kate regarding same; revisions to same | | | |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Review and revise and further draft settlement conference memorandum; multiple telephone conferences with Holly Smith, Esquire regarding strategy for settlement conference memorandum; exchange text messages with client regarding settlement conference | | | |
| SGC | 0.4 | \$ 960.00 | \$ 384.00 | telephone conference with Kate | | | |
| SGC | 0.8 | \$ 960.00 | \$ 768.00 | emails to/from Kate, texts to/from R, file review | | | |
| SGC | 0.4 | \$ 960.00 | \$ 384.00 | review Ct order, file review | | | |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Review and analyze correspondence from opposing counsel to Judge Donio regarding settlement; exchange emails with oc | | | |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | emails to/from attys, telephone conference with Kate, telephone conference with OC, file review | | | |
| SGC | 1.6 | \$ 960.00 | \$ 1,536.00 | telephone conferences w Kate, t f, texts to/from RH. Analyze settlement position | | | |
| SGC | 0.4 | \$ 960.00 | \$ 384.00 | telephone conference with Kate (9/15) | | | |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding letter to Court | | | |
| SGC | 0.6 | \$ 960.00 | \$ 576.00 | review Ct order, emails to/from attys | | | |
| HS | 0.3 | \$ 240.00 | \$ 72.00 | Internal conference with Steve regarding case strategy and SJ opinion | | | |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Holly | | | |
| HS | 1 | \$ 240.00 | \$ 240.00 | Reviewed SJ opinion; telephone conference with Kate and client regarding same | | | |

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|---|-----|-----------|-------------|--|-----|-------------|-------------|
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze opinion and order; telephone conference with client regarding same; telephone conference with Stephen G. Console, Esquire regarding same | | | |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Kate | | | |
| SUMMARY JUDGMENT OPINION FILED ON AUGUST 31, 2022 | | | | | | | |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| SGC | 0.6 | \$ 960.00 | \$ 576.00 | telephone conference with Kate | 0.4 | \$ 360.00 | \$ 216.00 |
| HS | 3.5 | \$ 240.00 | \$ 840.00 | Prepared for and attended oral argument on Starbucks' SJ motion; phone conferences with Kate before and after same; travel to and from same | 2.2 | \$ 525.00 | \$ 315.00 |
| KCO | 5.2 | \$ 520.00 | \$ 2,704.00 | Prepare for and participate in oral argument on Defendant's motion for summary judgment; telephone conference with client regarding oral argument and next steps | 3.3 | \$ 1,690.00 | \$ 1,014.00 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| HS | 2.5 | \$ 240.00 | \$ 600.00 | Prepared for oral argument on Starbucks' SJ motion; intenal communications with Kate regarding same | 1.6 | \$ 375.00 | \$ 225.00 |
| HS | 1 | \$ 240.00 | \$ 240.00 | Revised summary judgment sur-reply | 1 | \$ 150.00 | \$ 90.00 |
| HS | 2 | \$ 240.00 | \$ 480.00 | Revised summary judgment sur-reply | 1 | \$ 300.00 | \$ 180.00 |
| KCO | 1.3 | \$ 520.00 | \$ 676.00 | Review, analyze and revise draft sur-reply; telephone discussion with Holly Smith, Esquire regarding same | 0.8 | \$ 422.50 | \$ 253.50 |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Drafted summary judgment sur-reply | 3 | \$ 750.00 | \$ 450.00 |
| HS | 3.1 | \$ 240.00 | \$ 744.00 | Drafted summary judgment sur-reply | 1.9 | \$ 465.00 | \$ 279.00 |
| KCO | 1.7 | \$ 520.00 | \$ 884.00 | Internal conference with Holly Smith, Esaurie regaridng strategy for sur-reply brief; analysis regarding legal issues for same | 1.1 | \$ 552.50 | \$ 331.50 |
| KCO | 0.9 | \$ 520.00 | \$ 468.00 | Review, further draft and revise motion to file sur-reply; finalize same and coordinate filing | 0.6 | \$ 292.50 | \$ 175.50 |
| HS | 5.1 | \$ 240.00 | \$ 1,224.00 | Reviewed Defendant's summary judgment reply; reviewed summary judgment record to locate inconsistencies between Defendant's reply and opening brief; drafted motion to file surreply | 3.2 | \$ 765.00 | \$ 459.00 |
| KCO | 1.1 | \$ 520.00 | \$ 572.00 | Review and analyze reply; review and analyze legal issues for sur reply, telephone conference with Holly Smith Esquire regarding same | 0.7 | \$ 357.50 | \$ 214.50 |
| HS | 8 | \$ 240.00 | \$ 1,920.00 | Revised statement of affirmative facts and response to def's facts; reviewed tables and exhibits; finalized summary judgment brief; added cites to record | 5 | \$ 1,200.00 | \$ 720.00 |

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|-----|------|-----------|-------------|---|-----|-------------|-------------|
| KCO | 4 | \$ 520.00 | \$ 2,080.00 | Continue to draft opposition to Defendant's 56.1 facts; review, analyze and revise brief in opposition to Defendant's motion for summary judgment; review, analyze and revise affirmative facts; internal conference with Holly Smith, Esquire; | 3 | \$ 1,300.00 | \$ 780.00 |
| HS | 9.1 | \$ 240.00 | \$ 2,184.00 | Drafted statement of affirmative facts and summary judgment opp brief | 5.7 | \$ 1,365.00 | \$ 819.00 |
| KCO | 6.3 | \$ 520.00 | \$ 3,276.00 | Continue to draft opposition to 56.1 facts; continue to review and analyze legal issues with Holly Smith, Esquire; exchange text messages with client regarding certain facts | 3.9 | \$ 2,047.50 | \$ 1,228.50 |
| HS | 10.5 | \$ 240.00 | \$ 2,520.00 | Drafted statement of affirmative facts and summary judgment opp brief | 6.6 | \$ 1,575.00 | \$ 945.00 |
| KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Continue to work on oppo to 56.1 facts; exchange multiple emails, texts and phone calls with Holly Smith, Esquire regarding opposition and strategy | 1.6 | \$ 812.50 | \$ 487.50 |
| HS | 3.5 | \$ 240.00 | \$ 840.00 | Drafted statement of affirmative facts and summary judgment opp brief | 2.2 | \$ 525.00 | \$ 315.00 |
| KCO | 6.1 | \$ 520.00 | \$ 3,172.00 | Continue to draft opposition to Defendant's 56.1 facts; exchange multiple emails with Holly Smith, Esquire regarding strategy for brief and facts | 3.8 | \$ 1,982.50 | \$ 1,189.50 |
| HS | 8 | \$ 240.00 | \$ 1,920.00 | Reviewed depositions of Zeta Smith, Shannon B, Sykes, and Trinsey and drafted affirmative facts; drafted summary judgment opposition brief | 5 | \$ 1,200.00 | \$ 720.00 |
| KCO | 5.5 | \$ 520.00 | \$ 2,860.00 | Continue to draft opposition to Defendant's 56.1 facts | 3.4 | \$ 1,787.50 | \$ 1,072.50 |
| HS | 8 | \$ 240.00 | \$ 1,920.00 | drafted summary judgment opposition brief | 5 | \$ 1,200.00 | \$ 720.00 |
| HS | 9.1 | \$ 240.00 | \$ 2,184.00 | drafted summary judgment opposition brief | 5.7 | \$ 1,365.00 | \$ 819.00 |
| HS | 4.9 | \$ 240.00 | \$ 1,176.00 | drafted summary judgment opposition brief | 3.1 | \$ 735.00 | \$ 441.00 |
| HS | 6.2 | \$ 240.00 | \$ 1,488.00 | Legal research for summary judgment opposition brief | 3.9 | \$ 930.00 | \$ 558.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Continue to draft opposition to 56.1 facts | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Continue to draft opposition to Defendant's 56.1 facts; begin to draft Plaintiff's affirmative facts | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Continue to draft response to Defendant's 56.1 facts | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Continue to draft opposition to Defendant's 56.1 facts; internal conference with Holly Smith, Esquire regarding research and analysis of legal issues in Defendant's motion for summary judgment | 0.9 | \$ 487.50 | \$ 292.50 |
| KCO | 7.2 | \$ 520.00 | \$ 3,744.00 | Begin to draft opposition to Defendant's 56.1 facts; internal conference (multiple) with Holly Smith, Esquire regarding analysis of legal issues for brief in opposition to summary judgment | 4.5 | \$ 2,340.00 | \$ 1,404.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Review and analyze correspondence to the Court | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Telephone conference with Holly Smith, Esquire regarding legal research on retaliation/protected activity issues | 0.2 | \$ 97.50 | \$ 58.50 |

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|-----|-----|-----------|-------------|---|-----|-------------|-----------|
| KCO | 3 | \$ 520.00 | \$ 1,560.00 | Prepare for and take expert deposition; telephone conference with opposing counsel regarding same; exchange emails with opposing counsel regarding stipulation | 2 | \$ 975.00 | \$ 585.00 |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Kate | 0.3 | \$ 300.00 | \$ 180.00 |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | Telephone conference with Stephen G. Console, Esquire to prepare for expert deposition | 0.4 | \$ 227.50 | \$ 136.50 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Telephone conference with Holly Smith, Esquire regarding strategy for opposing summary judgment | 0.3 | \$ 162.50 | \$ 97.50 |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | internal conference with Kate | 0.3 | \$ 300.00 | \$ 180.00 |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | file review, telephone conference with Kate | 0.3 | \$ 300.00 | \$ 180.00 |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review and analyze Defendant's motion for summary judgment; draft and send email to opposing counsel regarding their errors in filing; draft and send email to opposing counsel regarding their violation of a confidentiality order; | 0.9 | \$ 487.50 | \$ 292.50 |
| KCO | 1.7 | \$ 520.00 | \$ 884.00 | Exchange emails with opposing counsel regarding depositions; file review; exchange emails with client regarding case status and next steps; | 1.1 | \$ 552.50 | \$ 331.50 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding extension; | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Exchange emails with opposing counsel regarding expert deps; draft letter to Judge Slomsky regarding extension; telephone conference with Holly Smith, Esquire regarding same | 0.3 | \$ 130.00 | \$ 78.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Review expert deadline | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding expert depositions | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 1.8 | \$ 520.00 | \$ 936.00 | Prepare for and take deposition (continued) of Nathalie Cioffi | 1.1 | \$ 585.00 | \$ 351.00 |
| KCO | 1.3 | \$ 520.00 | \$ 676.00 | Continue to prepare for depositions | 0.8 | \$ 422.50 | \$ 253.50 |
| KCO | 2.6 | \$ 520.00 | \$ 1,352.00 | Prepare for and defend deposition of Plaintiff's economic loss expert; draft and send multiple emails to opposing counsel regarding deposition of their expert and documents they have been ordered to produce | 1.6 | \$ 845.00 | \$ 507.00 |
| KCO | 0.9 | \$ 520.00 | \$ 468.00 | Prepare for expert deposition; telephone conference with expert | 0.6 | \$ 292.50 | \$ 175.50 |
| HS | 2 | \$ 240.00 | \$ 480.00 | Prepared for and attended oral argument on motion to compel/motion for sanctions | 1 | \$ 300.00 | \$ 180.00 |
| KCO | 3.5 | \$ 520.00 | \$ 1,820.00 | Prepare for, travel to and participate in oral argument before the Hon. J. Slomsky regarding Plaintiff's Motion to Compel | 2.2 | \$ 1,137.50 | \$ 682.50 |
| HS | 3 | \$ 240.00 | \$ 720.00 | Revised and finalized reply to motion to compel/for sanctions; internal conferences with Kate regarding same | 2 | \$ 450.00 | \$ 270.00 |
| KCO | 1.8 | \$ 520.00 | \$ 936.00 | Review, analyze and revise (multiple times) draft reply from Holly Smith, Esquire; coordinate filing of same | 1.1 | \$ 585.00 | \$ 351.00 |

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|-----|-----|-----------|-------------|--|-----|-------------|-------------|
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze opposition filed by Defendant to motion to compel; telephone conference with Holly Smith, Esquire regarding strategy to reply | 1 | \$ 325.00 | \$ 195.00 |
| HS | 3.2 | \$ 240.00 | \$ 768.00 | Drafted reply to motion to compel/for sanctions | 2.0 | \$ 480.00 | \$ 288.00 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | review and analyze court order regarding hearing; telephone conference with Stephen G. Console, Esquire regarding same | 0.4 | \$ 195.00 | \$ 117.00 |
| HS | 1 | \$ 240.00 | \$ 240.00 | Reviewed Starbucks' opposition to motion to compel/motion for sanctions; telephone conferences with Kate regarding same | 1 | \$ 150.00 | \$ 90.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze opposition filed by Defendant; telephone conference with Holly Smith, Esquire regarding same. | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Exchange emails with opposing counsel regarding expert deposition | 0.2 | \$ 97.50 | \$ 58.50 |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Coordinate production of documents; exchange emails with opposing counsel regarding deposition of expert | 0.5 | \$ 260.00 | \$ 156.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Draft and send email to opposing counsel; review and analyze documents for production | 0.3 | \$ 130.00 | \$ 78.00 |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | Review and analyze documents for production; | 0.4 | \$ 227.50 | \$ 136.50 |
| KCO | 1.7 | \$ 520.00 | \$ 884.00 | Review and analyze Defendant's document requests to assess responsiveness to requests; draft and send email to client enclosing motion; multiple internal telephone conferences with Holly Smith, Esquire regarding case status and strategy; review and analyze rebuttal economic loss report from Defendant; telephone conference with Stephen G. Console, Esquire regarding Defendant's economic loss report and strategy for addressing same | 1.1 | \$ 552.50 | \$ 331.50 |
| SGC | 0.8 | \$ 960.00 | \$ 768.00 | Emails to and from Kate; telephone conference with Kate regarding expert issues | 0.5 | \$ 480.00 | \$ 288.00 |
| HS | 3.5 | \$ 240.00 | \$ 840.00 | Revised and finalized motion to compel/motion for sanctions; internal conferences with Kate regarding same | 2.2 | \$ 525.00 | \$ 315.00 |
| KCO | 6.2 | \$ 520.00 | \$ 3,224.00 | Review, further draft and revise motion to compel discovery; exchange emails with opposing counsel; draft supporting documents; coordinate filing of motion | 3.9 | \$ 2,015.00 | \$ 1,209.00 |
| HS | 7.5 | \$ 240.00 | \$ 1,800.00 | Drafted motion to compel and motion for sanctions; internal conferences with Kate regarding same | 4.7 | \$ 1,125.00 | \$ 675.00 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Internal conference regarding withheld documents | 0.2 | \$ 97.50 | \$ 58.50 |
| HS | 2 | \$ 240.00 | \$ 480.00 | Attended deposition of Zeta Smith; strategy discussions with Kate regarding same | 1 | \$ 300.00 | \$ 180.00 |
| KCO | 3 | \$ 520.00 | \$ 1,560.00 | Prepare for and take deposition of Zeta Smith; exchange emails with opposing counsel regarding withheld document; multiple internal conferences with Holly Smith, Esquire regarding motion; multiple telephone conferences with client regarding case status and strategy | 2 | \$ 975.00 | \$ 585.00 |

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|-----|-----|-----------|-------------|---|-----|-------------|-----------|
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| HS | 3 | \$ 240.00 | \$ 720.00 | Legal research for motion to compel/motion for sanctions; internal conferences with Kate and law clerk regarding same | 2 | \$ 450.00 | \$ 270.00 |
| HS | 2 | \$ 240.00 | \$ 480.00 | Internal conferences with Kate and Steve regarding Sykes' deposition and document withholding; telephone conference with Kate regarding discovery motion | 1 | \$ 300.00 | \$ 180.00 |
| KCO | 3 | \$ 520.00 | \$ 1,560.00 | Telephone conference with Stephen G. Console, Esquire regarding Defendant withholding a document and its discovery during depositions; settlement and case strategy; telephone conference with client regarding same; exchange multiple emails with opposing counsel on withheld documents; internal conference with Haley (law clerk) and Holly Smith, Esquire regarding discovery motion; review and analyze multiple emails between Rich Harris, Esquire and Stephen G. Console, Esquire | 2 | \$ 975.00 | \$ 585.00 |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Kate; emails to and from opposing counsel | 0.9 | \$ 900.00 | \$ 540.00 |
| HS | 1.5 | \$ 240.00 | \$ 360.00 | Attended Paul Sykes' deposition | 0.9 | \$ 225.00 | \$ 135.00 |
| KCO | 3 | \$ 520.00 | \$ 1,560.00 | Prepare for and take deposition of Paul Sykes | 2 | \$ 975.00 | \$ 585.00 |
| HS | 1 | \$ 240.00 | \$ 240.00 | Outline and prep documents for Paul Sykes' deposition; telephone conference with Kate regarding same | 1 | \$ 150.00 | \$ 90.00 |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Review, analyze and respond to emails from opposing counsel regarding outstanding depositions | 0.5 | \$ 260.00 | \$ 156.00 |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | Exchange emails with econ loss expert; exchange emails with client; telephone conference with client; draft and send email to opposing counsel enclosing econ loss expert report | 0.4 | \$ 227.50 | \$ 136.50 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| HS | 1 | \$ 240.00 | \$ 240.00 | internal conference with Kate and Haley; reviewed docs for motion to compel | 1 | \$ 150.00 | \$ 90.00 |
| KCO | 3.9 | \$ 520.00 | \$ 2,028.00 | Zoom conference with law clerk regarding research and analysis of legal issues; internal conference with Holly Smith, Esquire and Haley, law clerk, regarding case status and strategy and anticipated motion to the Court; review and analyze documents for expert report; telephone conference with client regarding expert report; exchange emails with expert regarding report; draft and send email to opposing counsel regarding Sykes and Smith depositions | 2.4 | \$ 1,267.50 | \$ 760.50 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Telephone conference with law clerk regarding her legal research on investigation/privilege issue | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange text messages with client regarding economic expert draft report | 0.1 | \$ 65.00 | \$ 39.00 |
| HS | 0.6 | \$ 240.00 | \$ 144.00 | Zoom call with Kate and law clerk regarding investigation/privilege | 0.4 | \$ 90.00 | \$ 54.00 |

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|-----|-----|-----------|-------------|---|-----|-------------|-----------|
| KCO | 1.1 | \$ 520.00 | \$ 572.00 | Zoom conference with law clerk and Holly Smith, Esquire regarding research and analysis of legal issue associated with investigation; exchange emails with opposing counsel regarding discovery issues and deadline; finalize and circulate letter to Judge Slomsky seeking extension in fact discovery (only) | 0.7 | \$ 357.50 | \$ 214.50 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter to court requesting fact discovery extension | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 1.6 | \$ 520.00 | \$ 832.00 | Exchange emails with expert economist; exchange multiple emails with opposing counsel regarding discovery dispute on investigative report; exchange emails with Paul Sykes, witness regarding rescheduling of his deposition; review and analyze 2020 financial documents from client and coordinate production of same | 1.0 | \$ 520.00 | \$ 312.00 |
| HS | 5 | \$ 240.00 | \$ 1,200.00 | Attended depositions of Trinsey and Hymes (continued); prepped for same; telephone conferences and text messages with Kate regarding same | 3 | \$ 750.00 | \$ 450.00 |
| KCO | 5 | \$ 520.00 | \$ 2,600.00 | Prepare for and take deposition of Ben Trinsey and continued deposition of Camille Hymes; multiple telephone conferences with client; begin to collect and analyze documents for the expert | 3 | \$ 1,625.00 | \$ 975.00 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | Telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| HS | 2 | \$ 240.00 | \$ 480.00 | Outlined and selected documents for depositions of Trinsey and continued deposition of Camille Hymes; internal conferences with Kate regarding same | 1 | \$ 300.00 | \$ 180.00 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Draft and send multiple emails to opposing counsel regarding outstanding documents and deposition scheduling | 0.3 | \$ 162.50 | \$ 97.50 |
| KCO | 0.9 | \$ 520.00 | \$ 468.00 | Telephone conference with witness Paul Sykes; draft and send email to opposing counsel regarding depositions; draft and send emails to two witnesses regarding depositions; Review and analyze objections to 30b6 designations; exchange text messages with client regarding deposition scheduling | 0.6 | \$ 292.50 | \$ 175.50 |
| KCO | 1.1 | \$ 520.00 | \$ 572.00 | Continue to revise and further draft responses to second set of requests for the production of documents; telephone conference with client regarding same; draft and send email to opposing counsel enclosing responses | 0.7 | \$ 357.50 | \$ 214.50 |
| HS | 1 | \$ 240.00 | \$ 240.00 | Drafted supplemental discovery requests; telephone conversations and text messages with Kate regarding same | 1 | \$ 150.00 | \$ 90.00 |
| KCO | 3.8 | \$ 520.00 | \$ 1,976.00 | Exchange emails with opposing counsel regarding discovery disputes; review and revise and further draft second set of discovery responses; exchange multiple texts and emails with client regarding same | 2.4 | \$ 1,235.00 | \$ 741.00 |

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|-----|-----|-----------|-------------|---|-----|-------------|-------------|
| HS | 4 | \$ 240.00 | \$ 960.00 | Attended depositions of Johnson and Boldizar; multiple phone calls and text exchanges with Kate regarding same | 3 | \$ 600.00 | \$ 360.00 |
| KCO | 6.2 | \$ 520.00 | \$ 3,224.00 | Prepare for and take depositions of Shannon Boldizar and Ebony Johnson | 3.9 | \$ 2,015.00 | \$ 1,209.00 |
| HS | 1.5 | \$ 240.00 | \$ 360.00 | Created outlines and selected/indexed documents for Boldizar and Johnson depositions; email correspondence with Kate regarding same | 0.9 | \$ 225.00 | \$ 135.00 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | Exchange emails with opposing counsel regarding discovery dispute; exchange text message with client regarding depositions on Tuesday May 4; telephone conference with Holly Smith, Esquire regarding deposition exhibits and selection of same | 0.4 | \$ 195.00 | \$ 117.00 |
| HS | 1.9 | \$ 240.00 | \$ 456.00 | Created outlines and selected/indexed documents for Boldizar and Johnson depositions; email correspondence with Kate regarding same | 1.2 | \$ 285.00 | \$ 171.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Exchange emails with opposing counsel regarding discovery dispute (30b6 and spoliation) | 0.3 | \$ 130.00 | \$ 78.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with oc; coordinate filing of letter and stipulation; exchange text messages with client regarding outstanding subs | 0.1 | \$ 65.00 | \$ 39.00 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter requesting discovery extension; email correspondence with Kate and telephone conference regarding same | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Review and revise letter drafted by Holly Smith Esquire regarding discovery extension; draft and send email to opposing counsel enclosing same | 0.3 | \$ 130.00 | \$ 78.00 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Reviewed subpoenas and cover letters for unrepresented witnesses | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Review, analyze and revise subpoenas and letters enclosing same; coordinate service of subpoenas | 0.5 | \$ 260.00 | \$ 156.00 |
| KCO | 1.2 | \$ 520.00 | \$ 624.00 | Telephone conference with opposing counsel to meet and confer on deposition dates and outstanding ESI/preservation issues; draft and send email to client enclosing update | 0.8 | \$ 390.00 | \$ 234.00 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Exchange emails with economic loss expert | 0.2 | \$ 97.50 | \$ 58.50 |
| KCO | 2.9 | \$ 520.00 | \$ 1,508.00 | Participate in settlement conference before the Hon. Judge Wells; multiple telephone conferences with client and Stephen G. Console, Esquire regarding settlement | 1.8 | \$ 942.50 | \$ 565.50 |
| SGC | 3 | \$ 960.00 | \$ 2,880.00 | Prepare for and attend settlement conference with Kate ; telephone conference with Kate and client; file review | 2 | \$ 1,800.00 | \$ 1,080.00 |

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|-----|-----|-----------|-------------|---|-----|-------------|-------------|
| KCO | 2.1 | \$ 520.00 | \$ 1,092.00 | Prepare for settlement conference before the Hon. Judge Wells; multiple telephone conferences with Stephen G. Console, Esquire regarding same; multiple telephone conferences with client regarding same | 1.3 | \$ 682.50 | \$ 409.50 |
| SGC | 2 | \$ 960.00 | \$ 1,920.00 | Prepare for settlement conference; telephone conference with Kate; telephone conference with opposing counsel; emails to from attorneys | 1 | \$ 1,200.00 | \$ 720.00 |
| KCO | 1.6 | \$ 520.00 | \$ 832.00 | File review; begin to draft settlement conference memorandum; draft and send multiple emails to Stephen G. Console, Esquire regarding settlement conference; exchange multiple texts and emails with client | 1.0 | \$ 520.00 | \$ 312.00 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Review, analyze and respond to multiple emails from opposing counsel regarding depositions and outstanding discovery items | 0.3 | \$ 162.50 | \$ 97.50 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Review, analyze and respond to email from opposing counsel regarding subpoenas for Trinsey and Sykes; exchange text messages with client regarding same | 0.3 | \$ 162.50 | \$ 97.50 |
| HS | 4.2 | \$ 240.00 | \$ 1,008.00 | Attended deposition of Nathalie Cioffi; multiple telephone conversations and text messages with Kate during and after deposition | 2.6 | \$ 630.00 | \$ 378.00 |
| KCO | 6.7 | \$ 520.00 | \$ 3,484.00 | Prepare for and take deposition of Nathalie Cioffi; draft and send FRCP 45 notice of two subs (Trinsey and Sykes); draft and fax letter to Judge Wells re: settlement conference | 4.2 | \$ 2,177.50 | \$ 1,306.50 |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Emails to from Kate; telephone conference with Kate | 0.9 | \$ 900.00 | \$ 540.00 |
| HS | 10 | \$ 240.00 | \$ 2,400.00 | Attend Paul Pinto's deposition; telephone conversations with Kate regarding strategy and documents during deposition; prepared outline and document index for Nathalie Cioffi's deposition | 6 | \$ 1,500.00 | \$ 900.00 |
| KCO | 9 | \$ 520.00 | \$ 4,680.00 | Prepare for and take deposition of Paul Pinto; follow up discussion with client and Holly Smith, Esquire; strategy discussion with Stephen G. Console, Esquire regarding potential liability experts | 6 | \$ 2,925.00 | \$ 1,755.00 |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone conference with Kate; file review | 1 | \$ 600.00 | \$ 360.00 |
| HS | 4 | \$ 240.00 | \$ 960.00 | Prepared outline and document index for Paul Pinto's deposition; telephone conferences and emails with Kate regarding Pinto deposition | 3 | \$ 600.00 | \$ 360.00 |
| KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Prepare for deposition of Paul Pinto; exchange multiple emails with Holly Smith, Esquire regarding deposition of Paul Pinto and selecting Exhibits for same; review and analyze potential exhibits; telephone conference with client regarding strategy for Pinto Dep | 1.6 | \$ 812.50 | \$ 487.50 |

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| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Exchange emails with opposing counsel; begin to prepare for deposition of Paul Pinto | 0.9 | \$ 487.50 | \$ 292.50 |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Continue to review and analyze discovery responses and documents | 0.5 | \$ 260.00 | \$ 156.00 |
| KCO | 1.7 | \$ 520.00 | \$ 884.00 | Telephone conference with opposing counsel regarding settlement; review, analyze, revise and further draft second set of document requests; exchange emails with Holly Smith, Esquire regarding litigation tasks | 1.1 | \$ 552.50 | \$ 331.50 |
| SGC | 1.2 | \$ 960.00 | \$ 1,152.00 | Telephone conference with opposing counsel and Kate; telephone conferences with Kate; file review | 0.8 | \$ 720.00 | \$ 432.00 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Legal research regarding 30(b)(6); telephone conference with Kate regarding same | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | File review; telephone conference with Holly Smith, Esquire regarding 30b6 deposition notice; draft and send memorandum via email to Stephen G. Console, Esquire providing strategic information regarding upcoming telephone conference with Richard Harris, Esquire opposing counsel | 0.4 | \$ 227.50 | \$ 136.50 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Exchange emails with client; exchange emails with opposing counsel regarding settlement conference | 0.3 | \$ 130.00 | \$ 78.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 2.4 | \$ 520.00 | \$ 1,248.00 | Continue to review and analyze discovery responses and documents | 1.5 | \$ 780.00 | \$ 468.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Exchange emails with opposing counsel regarding depositions; exchange emails with opposing counsel regarding on-going discovery disputes | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 2.2 | \$ 520.00 | \$ 1,144.00 | Review and analyze document requests; draft and send communication to opposing counsel regarding deficiencies; draft and send email to Shannon Phillips regarding errata sheet | 1.4 | \$ 715.00 | \$ 429.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | File review | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Review, analyze and revise notices of deposition | 0.1 | \$ 65.00 | \$ 39.00 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter to clerk regarding pro hac vice fees; correspondence with billing department regarding payment of PHV fees | 0.3 | \$ 75.00 | \$ 45.00 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Telephone conference with Kate regarding discovery/case strategy | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | Telephone conference with Holly Smith Esquire regarding outstanding items and new assignments as well as case status and strategy | 0.4 | \$ 195.00 | \$ 117.00 |
| KCO | 1.2 | \$ 520.00 | \$ 624.00 | Draft and send multiple emails to opposing counsel regarding depositions, discovery etc. | 0.8 | \$ 390.00 | \$ 234.00 |

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|-----|-----|-----------|-------------|--|-----|-------------|-------------|
| HS | 9.5 | \$ 240.00 | \$ 2,280.00 | Attended Camille Hymes' deposition; multiple telephone conferences with Kate regarding strategy; telephone conference with client and Kate regarding Hymes' deposition | 5.9 | \$ 1,425.00 | \$ 855.00 |
| KCO | 10 | \$ 520.00 | \$ 5,200.00 | Prepare for and take deposition of Camille Hymes; telephone conference with Holly Smith Esquire (multiple) regarding strategy; telephone conference with client regarding deposition and next steps | 6 | \$ 3,250.00 | \$ 1,950.00 |
| HS | 7.8 | \$ 240.00 | \$ 1,872.00 | Camille Hymes' deposition dep prep: exhibits and dep outline | 4.9 | \$ 1,170.00 | \$ 702.00 |
| KCO | 6.1 | \$ 520.00 | \$ 3,172.00 | Prepare for deposition of Camille Hymes; review hot docs for selection of dep exhibits; exchange emails with opposing counsel regarding various discovery issues and details for deposition | 3.8 | \$ 1,982.50 | \$ 1,189.50 |
| HS | 9.7 | \$ 240.00 | \$ 2,328.00 | Camille Hymes' deposition dep prep: exhibits and dep outline; Drafted subpoenas for Ebony Johnson, Paul Pinto, and Zeta Smith; prepared 30(b)(6) notice; prepared NOD for Jennifer Frisch and Shannon Boldizar | 6.1 | \$ 1,455.00 | \$ 873.00 |
| KCO | 6.1 | \$ 520.00 | \$ 3,172.00 | Facetime conference with Stephen G. Console, Esquire regarding strategy; telephone conference with Holly Smith, Esquire regarding method for collecting dep exhibits; review and analyze hot documents for selection as deposition exhibits; draft and send emails to opposing counsel regarding challenge to confidential designation and missing client performance reviews; | 3.8 | \$ 1,982.50 | \$ 1,189.50 |
| SGC | 2 | \$ 960.00 | \$ 1,920.00 | telephone conference with Kate | 1 | \$ 1,200.00 | \$ 720.00 |
| HS | 2.1 | \$ 240.00 | \$ 504.00 | Camille Hymes' deposition dep prep: exhibits and outline | 1.3 | \$ 315.00 | \$ 189.00 |
| HS | 4.5 | \$ 240.00 | \$ 1,080.00 | Attended client's deposition | 2.8 | \$ 675.00 | \$ 405.00 |
| KCO | 7.5 | \$ 520.00 | \$ 3,900.00 | Prepare for deposition of Camille Hymes; prepare for and defend deposition of client; multiple telephone conferences with client; telephone conference with Stephen G. Console, Esquire regarding strategy | 4.7 | \$ 2,437.50 | \$ 1,462.50 |
| SGC | 0.4 | \$ 960.00 | \$ 384.00 | Telephone conferences with Kate | 0.3 | \$ 240.00 | \$ 144.00 |
| HS | 3.5 | \$ 240.00 | \$ 840.00 | Client deposition prep | 2.2 | \$ 525.00 | \$ 315.00 |
| KCO | 7.7 | \$ 520.00 | \$ 4,004.00 | Zoom conference with client to prepare for deposition; continue to review and analyze documents produced by Defendant; exchange multiple emails with Holly Smith, Esquire regarding tasks to be completed and depositions | 4.8 | \$ 2,502.50 | \$ 1,501.50 |
| KCO | 4.4 | \$ 520.00 | \$ 2,288.00 | Review documents produced by Defendant; continue to prepare for depositions | 2.8 | \$ 1,430.00 | \$ 858.00 |
| KCO | 4.3 | \$ 520.00 | \$ 2,236.00 | Exchange text messages with client regarding dep prep; prepare for depositions; review and analyze documents produced by Defendant | 2.7 | \$ 1,397.50 | \$ 838.50 |

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| KCO | 3.2 | \$ 520.00 | \$ 1,664.00 | Prepare for client's deposition; review and analyze letter from opposing counsel to the court (draft) seeking discovery extension; exchange multiple emails with opposing counsel regarding same; review and revise deposition guide for client; draft and send multiple emails to client enclosing documents in advance of deposition | 2.0 | \$ 1,040.00 | \$ 624.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Exchange emails with opposing counsel | 0.3 | \$ 130.00 | \$ 78.00 |
| HS | 4.1 | \$ 240.00 | \$ 984.00 | Drafted deficiency letter | 2.6 | \$ 615.00 | \$ 369.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Telephone conference with Holly Smith, Esquire regarding depositions and preparation for same | 0.3 | \$ 130.00 | \$ 78.00 |
| KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Draft and send letter to opposing counsel for approval before transmitting to Judge Wells; review, analyze and respond to email from opposing counsel regarding depositions; revise revised notices of deposition; draft and send email to opposing counsel enclosing revised notices of deposition; exchange text messages with client | 1.6 | \$ 812.50 | \$ 487.50 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | File review; email to Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Emails to and from Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze email from Judge Wells' Chambers regarding procedures for settlement conference; exchange emails with Stephen G. Console, Esquire and Holly Smith, Esquire regarding settlement conference and strategy; telephone conference with Holly Smith, Esquire regarding discovery strategy and settlement strategy | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review and analyze documents produced by both parties | 0.9 | \$ 487.50 | \$ 292.50 |
| HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter requesting discovery extension | 0.3 | \$ 75.00 | \$ 45.00 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Exchange emails with opposing counsel regarding discovery extension | 0.2 | \$ 97.50 | \$ 58.50 |
| HS | 6.5 | \$ 240.00 | \$ 1,560.00 | Reviewed documents produced by Starbucks; prepare hot doc index | 4.1 | \$ 975.00 | \$ 585.00 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Review and analyze scheduling order; review and analyze email from Holly Smith, Esquire regarding documents | 0.2 | \$ 97.50 | \$ 58.50 |
| HS | 8.0 | \$ 240.00 | \$ 1,920.00 | Reviewed documents produced by Starbucks; prepare hot doc index | 5 | \$ 1,200.00 | \$ 720.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Review and analyze emails from Holly Smith, Esquire regarding "hot docs" in Defendant's production; draft and send email to opposing counsel regarding extension letter | 0.1 | \$ 65.00 | \$ 39.00 |
| HS | 8.0 | \$ 240.00 | \$ 1,920.00 | Reviewed documents produced by Starbucks; prepare hot doc index | 5 | \$ 1,200.00 | \$ 720.00 |

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| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review, analyze and coordinate production of additional documents; exchange multiple emails with opposing counsel regarding discovery extension, depositions and documents; exchange emails with client | 0.9 | \$ 487.50 | \$ 292.50 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Review and analyze medical records of client; draft and send email to client enclosing same | 0.2 | \$ 97.50 | \$ 58.50 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | Telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel | 0.1 | \$ 65.00 | \$ 39.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Holly | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding medical records and ESI preservation issues | 0.1 | \$ 65.00 | \$ 39.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 2.2 | \$ 520.00 | \$ 1,144.00 | Review, analyze and respond to deficiency letter from Defendant; exchange text messages with client regarding depositions and return of company property; review and analyze medical index tracker; review and analyze additional documents for production | 1.4 | \$ 715.00 | \$ 429.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Jacquelyn Ryan | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Exchange emails with Marc Esterow, Esquire (opposing counsel) regarding depositions and scheduling; review and analyze multiple calendars regarding same | 0.3 | \$ 162.50 | \$ 97.50 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Exchange text messages with client regarding HIPAA authorizations; telephone conference with client regarding same | 0.3 | \$ 162.50 | \$ 97.50 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | Exchange multiple emails with opposing counsel regarding depositions | 0.3 | \$ 162.50 | \$ 97.50 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Exchange emails with Danielle Buccieri (paralegal) to coordinate filing of second amended complaint | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and revise (further) proposed confidentiality agreement; exchange emails with opposing counsel regarding same; exchange emails with opposing counsel regarding deposition dates; exchange text messages with client regarding deposition dates | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Draft and send two emails to opposing counsel regarding deposition dates and confidentiality stipulation | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | Telephone conference with Jacqueline Ryan, Esquire regarding documents, deficiency letter and case status/strategy; exchange text messages with client | 0.4 | \$ 227.50 | \$ 136.50 |
| KCO | 1.4 | \$ 520.00 | \$ 728.00 | Exchange additional emails with opposing counsel regarding confidentiality agreement; internal conference via telephone with Stephen G. Console, Esquire regarding case status and strategy | 0.9 | \$ 455.00 | \$ 273.00 |

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| SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| KCO | 1.2 | \$ 520.00 | \$ 624.00 | Exchange multiple emails with opposing counsel regarding discovery disputes; telephone conference with opposing counsel regarding discovery disputes; exchange text messages with client regarding deposition dates | 0.8 | \$ 390.00 | \$ 234.00 |
| KCO | 1.1 | \$ 520.00 | \$ 572.00 | Review, analyze and respond to email from opposing counsel regarding confidentiality agreement (for Monday 8/3 delivery); review for responsiveness, redact and produce additional documents | 0.7 | \$ 357.50 | \$ 214.50 |
| KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review, analyze and respond to multiple emails from opposing counsel regarding confidentiality agreement, depositions and discovery disputes | 0.9 | \$ 487.50 | \$ 292.50 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding depositions; exchange emails with client regarding outstanding documents | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 4 | \$ 520.00 | \$ 2,080.00 | Review and redline proposed confidentiality stipulation provided by Defendant; draft and send email to opposing counsel enclosing redline; review and analyze proposed stipulation to amend complaint and revise same; draft and send email to opposing counsel enclosing stipulation and proposed amended complaint; draft and send deposition notices to opposing counsel for C. Hymes, P. Pinto, Z. Smith and N. Cioffi; draft and send email to client enclosing Defendant's responses to interrogatories. | 3 | \$ 1,300.00 | \$ 780.00 |
| KCO | 6.5 | \$ 520.00 | \$ 3,380.00 | Continue to draft responses to document requests; continue to review and analyze client documents for responsiveness; draft and send email to opposing counsel enclosing document requests and provide link to document production; exchange text messages with client regarding outstanding documents | 4.1 | \$ 2,112.50 | \$ 1,267.50 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 4.8 | \$ 520.00 | \$ 2,496.00 | Continue to review client documents for production/responsiveness | 3.0 | \$ 1,560.00 | \$ 936.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Continue to review documents for production | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 6.2 | \$ 520.00 | \$ 3,224.00 | Continue to draft responses to document requests; continue to review and tag for production client documents; telephone conference with client regarding text messages | 3.9 | \$ 2,015.00 | \$ 1,209.00 |
| KCO | 2.7 | \$ 520.00 | \$ 1,404.00 | Continue to review client documents and select same for production as responsive to requests; telephone conference with client regarding certain ESI | 1.7 | \$ 877.50 | \$ 526.50 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Continue to draft responses to document requests | 1 | \$ 325.00 | \$ 195.00 |

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| KCO | 2.8 | \$ 520.00 | \$ 1,456.00 | Continue to draft discovery responses; exchange emails with client regarding same; draft and send email to opposing counsel serving RFA responses; coordinate services of ROG responses; begin to draft document request responses | 1.8 | \$ 910.00 | \$ 546.00 |
| KCO | 6 | \$ 520.00 | \$ 3,120.00 | Continue to draft discovery responses; exchange multiple emails with client regarding same; | 4 | \$ 1,950.00 | \$ 1,170.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Emails to and from Jacquelyn Ryan | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Continue to draft discovery responses | 1.6 | \$ 812.50 | \$ 487.50 |
| KCO | 2.4 | \$ 520.00 | \$ 1,248.00 | Continue to draft discovery responses; telephone conference with client about ESI collection; coordinate ESI collection; exchange emails with opposing counsel regarding discovery response time | 1.5 | \$ 780.00 | \$ 468.00 |
| KCO | 5 | \$ 520.00 | \$ 2,600.00 | Begin to draft discovery responses; exchange multiple emails and text messages with client regarding same; exchange emails with opposing counsel regarding discovery response deadline and confidentiality agreement | 3 | \$ 1,625.00 | \$ 975.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with client regarding discovery responses; exchange emails with opposing counsel regarding same | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Exchange emails with client regarding discovery responses and logistics for same | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Telephone conference with Judge Slomsky regarding transfer of case to him; exchange emails with opposing counsel regarding scheduling order; telephone conference with Jacqueline Ryan, Esquire regarding case status and assignments | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding ESI and discovery | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Exchange emails with opposing counsel regarding telephone conference to further discuss ESI | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding discovery deadlines | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Telephone conference with Jacqueline Ryan, Esquire regarding case status, strategy and assignments | 0.5 | \$ 260.00 | \$ 156.00 |
| KCO | 1.2 | \$ 520.00 | \$ 624.00 | Review, analyze and respond to multiple emails from client regarding discovery and deadlines; review, analyze and respond to email from opposing counsel regarding ESI; review and revise proposed confidentiality order; exchange emails with opposing counsel regarding same | 0.8 | \$ 390.00 | \$ 234.00 |
| KCO | 0.7 | \$ 520.00 | \$ 364.00 | Exchange emails with Don Myers, Esquire regarding on-going ESI negotiations/issues | 0.4 | \$ 227.50 | \$ 136.50 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Review, analyze and respond to email from Don Myers, Esquire regarding deletion of Ebony Johnson's electronic information | 0.2 | \$ 97.50 | \$ 58.50 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Telephone conference with client regarding discovery requests | 1 | \$ 325.00 | \$ 195.00 |

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|-----|-----|-----------|-------------|---|-----|-------------|-------------|
| KCO | 1.6 | \$ 520.00 | \$ 832.00 | Telephone conference with opposing counsel regarding ESI; exchange emails with client | 1.0 | \$ 520.00 | \$ 312.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding discovery | 0.1 | \$ 65.00 | \$ 39.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | Prepare for and participate in Rule 16 before the Hon. Ann Marie Donio via teleconference | 0.4 | \$ 195.00 | \$ 117.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | Email with Kate | 0.1 | \$ 18.75 | \$ 11.25 |
| KCO | 2 | \$ 520.00 | \$ 1,040.00 | Draft initial disclosures; draft initial discovery requests; draft and send email to opposing counsel enclosing same; telephone conference with Stephen G. Console, Esquire regarding case status and strategy; exchange emails with opposing counsel regarding improper contact by Starbucks attorney with Shannon; exchange emails with opposing counsel regarding stipulation to file second amended complaint | 1 | \$ 650.00 | \$ 390.00 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| KCO | 2.2 | \$ 520.00 | \$ 1,144.00 | Draft Initial Disclosures; exchange text messages with client regarding contact from SBUX attorney | 1.4 | \$ 715.00 | \$ 429.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Further review and revise proposed joint discovery plan | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 0.3 | \$ 520.00 | \$ 156.00 | Continue to draft proposed joint discovery plan | 0.2 | \$ 97.50 | \$ 58.50 |
| KCO | 1.1 | \$ 520.00 | \$ 572.00 | Review, analyze and revise joint discovery plan; draft and send email to opposing counsel enclosing same | 0.7 | \$ 357.50 | \$ 214.50 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | Rule 26f telephone conference with Marc Esterow, Esquire (opposing counsel) | 0.4 | \$ 195.00 | \$ 117.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Review and analyze email from client regarding discovery items | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 0.8 | \$ 520.00 | \$ 416.00 | Review and analyze Defendant's Answer; draft and send email to client regarding same | 0.5 | \$ 260.00 | \$ 156.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Review and analyze FOIA documents | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 1.1 | \$ 520.00 | \$ 572.00 | In person meeting with client to discuss case status and strategy | 0.7 | \$ 357.50 | \$ 214.50 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | Draft and send email to client; review and analyze Court's ruling; review and analyze Judge's policies and procedures to determine when the Defendant's responsive pleading is due; draft and send email to opposing counsel regarding same | 0.4 | \$ 195.00 | \$ 117.00 |
| KCO | 5.2 | \$ 520.00 | \$ 2,704.00 | Review and analyze second letter from Defendant to the Hon. Renee Marie Bumb; research and analyze legal issues related to motion to dismiss of a race discrimination claim; draft opposition letter for the Court in response to Defendant's letter seeking partial motion to dismiss; finalize letter and coordinate filing with the Court | 3.3 | \$ 1,690.00 | \$ 1,014.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Draft Amended Complaint; coordinate filing of same | 0.3 | \$ 130.00 | \$ 78.00 |
| KCO | 6.9 | \$ 520.00 | \$ 3,588.00 | Research, analyze and draft letters to Judge Bumb addressing two potential motions by Defendant: to dismiss pursuant to FRCP 12b6 and transfer; coordinate filing of same | 4.3 | \$ 2,242.50 | \$ 1,345.50 |

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|-----|-----|-----------|-------------|--|-----|-------------|-----------|
| KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Draft amended complaint; review, analyze and research issues raised by two letters to court (motion to transfer, motion to dismiss) by Defendant; telephone conference with client; internal conference with Anna D. Norman, Esquire regarding motion to transfer research | 1.6 | \$ 812.50 | \$ 487.50 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | Telephone conference with Kate | 0.2 | \$ 180.00 | \$ 108.00 |
| KCO | 0.6 | \$ 520.00 | \$ 312.00 | Review and begin to analyze two letters asserting potential Rule 12 Motions from Defendant to the Hon. Renee Marie Bumb, U.S.D.J. regarding motion to dismiss and motion to transfer; | 0.4 | \$ 195.00 | \$ 117.00 |
| KCO | 0.4 | \$ 520.00 | \$ 208.00 | Review and analyze email from opposing counsel to Stephen G. Console, Esquire; Internal conference with Stephen G. Console, Esquire; telephone conference with client; waivers to opposing counsel | 0.3 | \$ 130.00 | \$ 78.00 |
| SGC | 1 | \$ 960.00 | \$ 960.00 | Email to and from opposing counsel; internal conference with Kate; file review; telephone conference with client and Kate | 1 | \$ 600.00 | \$ 360.00 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Draft and send email to opposing counsel regarding service waiver | 0.1 | \$ 32.50 | \$ 19.50 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Emails to and from Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Telephone conference with client; telephone conference with Stephen G. Console, Esquire regarding case status and strategy | 1 | \$ 325.00 | \$ 195.00 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Telephone conference with Stephen G. Console, Esquire regarding case status and strategy; draft and send text to client; draft and send email to opposing counsel regarding service waivers | 1 | \$ 325.00 | \$ 195.00 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | Internal conference with a Kate; review file | 0.2 | \$ 180.00 | \$ 108.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with Kate | 0.1 | \$ 18.75 | \$ 11.25 |
| KCO | 0.5 | \$ 520.00 | \$ 260.00 | File review for service related issues; draft and send email to client regarding judge assignment and in person meeting | 0.3 | \$ 162.50 | \$ 97.50 |
| LCM | 1.2 | \$ 870.00 | \$ 1,044.00 | Review all docs in trial binder. Review and revise complaint. Internal conference with Kate regarding complaint. Internal conference with Steve regarding complaint. | 0.8 | \$ 652.50 | \$ 391.50 |
| KCO | 2.7 | \$ 520.00 | \$ 1,404.00 | Continue to draft complaint; telephone conference with client regarding same; exchange multiple emails with Laura C. Mattiacci, Esquire regarding revisions to complaint; coordinate filing of same | 1.7 | \$ 877.50 | \$ 526.50 |
| LCM | 1 | \$ 870.00 | \$ 870.00 | Review trial binder. Emails to and from Kate regarding complaint. | 1 | \$ 543.75 | \$ 326.25 |
| KCO | 5.1 | \$ 520.00 | \$ 2,652.00 | Continue to draft District of New Jersey complaint; | 3.2 | \$ 1,657.50 | \$ 994.50 |
| KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Review and analyze client documents, timeline, charge of discrimination; begin to draft complaint; telephone conference with Stephen G. Console, Esquire regarding venue; voicemail to client | 1.6 | \$ 812.50 | \$ 487.50 |

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|-----|-----|-----------|-----------|--|-----|-----------|-----------|
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.1 | \$ 120.00 | \$ 72.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Draft and send email to client regarding receipt of right to sue | 0.1 | \$ 65.00 | \$ 39.00 |
| KCO | 0.2 | \$ 520.00 | \$ 104.00 | Internal conference with Stephen G. Console, Esquire regarding case status and strategy | 0.1 | \$ 65.00 | \$ 39.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with Cheryl Weaver (paralegal) | 0.1 | \$ 18.75 | \$ 11.25 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Draft letter requesting right to sue | 0.1 | \$ 32.50 | \$ 19.50 |
| KCO | 0.1 | \$ 520.00 | \$ 52.00 | Continue to review and analyze file to prepare right to sue request | 0.1 | \$ 32.50 | \$ 19.50 |
| EDF | 0.5 | \$ 300.00 | \$ 150.00 | telephone conference with client with Kate; email with client | 0.3 | \$ 93.75 | \$ 56.25 |
| KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze file to prepare for telephone conference with with client; telephone conference with with Emily Derstine Friessen, Esquire and client regarding case status and strategy. | 1 | \$ 325.00 | \$ 195.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with client | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.4 | \$ 300.00 | \$ 120.00 | email with Kate; internal conference with Steve and Kate; read documents | 0.3 | \$ 75.00 | \$ 45.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with client | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | file rebuttal | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.2 | \$ 300.00 | \$ 60.00 | internal conference with Steve | 0.1 | \$ 37.50 | \$ 22.50 |
| SGC | 0.1 | \$ 960.00 | \$ 96.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.1 | \$ 60.00 | \$ 36.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with client | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 2.7 | \$ 300.00 | \$ 810.00 | draft rebuttal; read file documents | 1.7 | \$ 506.25 | \$ 303.75 |
| EDF | 0.2 | \$ 300.00 | \$ 60.00 | email with client | 0.1 | \$ 37.50 | \$ 22.50 |
| EDF | 0.3 | \$ 300.00 | \$ 90.00 | email with client and EEOC; read position statement | 0.2 | \$ 56.25 | \$ 33.75 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with EEOC | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with client | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with EEOC | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.2 | \$ 300.00 | \$ 60.00 | internal conference with Steve | 0.1 | \$ 37.50 | \$ 22.50 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.1 | \$ 120.00 | \$ 72.00 |
| EDF | 0.2 | \$ 300.00 | \$ 60.00 | email with client; read client document | 0.1 | \$ 37.50 | \$ 22.50 |
| EDF | 0.5 | \$ 300.00 | \$ 150.00 | telephone conference with opposing counsel with Steve | 0.3 | \$ 93.75 | \$ 56.25 |
| SGC | 0.6 | \$ 960.00 | \$ 576.00 | Internal conference with Emily Derstine Friesen, Esquire; telephone conference with opposing counsel | 0.4 | \$ 360.00 | \$ 216.00 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with opposing counsel | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.5 | \$ 300.00 | \$ 150.00 | telephone conference with opposing counsel with Steve; internal conference with Steve; email with opposing counsel | 0.3 | \$ 93.75 | \$ 56.25 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with client | 0.1 | \$ 18.75 | \$ 11.25 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Voice mail - opposing counsel | 0.1 | \$ 120.00 | \$ 72.00 |
| EDF | 0.5 | \$ 300.00 | \$ 150.00 | internal conference with Steve; telephone conference with opposing counsel with Steve; email with client | 0.3 | \$ 93.75 | \$ 56.25 |
| SGC | 0.6 | \$ 960.00 | \$ 576.00 | Internal conference with Emily Derstine Friesen, Esquire; voice mail - opposing counsel | 0.4 | \$ 360.00 | \$ 216.00 |
| EDF | 0.4 | \$ 300.00 | \$ 120.00 | email with client; read article; internal conference with Steve ; email with EEOC | 0.3 | \$ 75.00 | \$ 45.00 |
| SGC | 0.4 | \$ 960.00 | \$ 384.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.3 | \$ 240.00 | \$ 144.00 |

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|-----|--------|-----------|---------------|--|-------|--------------|-------------|
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | internal conference with Steve | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.1 | \$ 300.00 | \$ 30.00 | email with EEOC | 0.1 | \$ 18.75 | \$ 11.25 |
| EDF | 0.3 | \$ 300.00 | \$ 90.00 | email with client; read letter from opposing counsel; read articles | 0.2 | \$ 56.25 | \$ 33.75 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | File review; review article | 0.2 | \$ 180.00 | \$ 108.00 |
| SGC | 0.3 | \$ 960.00 | \$ 288.00 | Review article regarding Starbucks | 0.2 | \$ 180.00 | \$ 108.00 |
| EDF | 0.7 | \$ 300.00 | \$ 210.00 | internal conference with Steve; email with client; telephone conference and email with EEOC | 0.4 | \$ 131.25 | \$ 78.75 |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Internal conference with Emily Derstine Friesen, Esquire; file review | 0.3 | \$ 300.00 | \$ 180.00 |
| EDF | 1.8 | \$ 300.00 | \$ 540.00 | email with client; update charge; internal conference with Steve; research courtesy copy info; email with opposing counsel | 1.1 | \$ 337.50 | \$ 202.50 |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Review and revise draft Charge; internal conference with Emily Derstine Friesen, Esquire | 0.9 | \$ 900.00 | \$ 540.00 |
| EDF | 4.7 | \$ 300.00 | \$ 1,410.00 | draft charge; read file notes and documents; email with client; internal conference with Steve | 2.9 | \$ 881.25 | \$ 528.75 |
| SGC | 0.5 | \$ 960.00 | \$ 480.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.3 | \$ 300.00 | \$ 180.00 |
| EDF | 0.3 | \$ 300.00 | \$ 90.00 | internal conference with Steve; email with client | 0.2 | \$ 56.25 | \$ 33.75 |
| SGC | 0.2 | \$ 960.00 | \$ 192.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.1 | \$ 120.00 | \$ 72.00 |
| SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Initial Consultation | 0.9 | \$ 900.00 | \$ 540.00 |
| | 1410.2 | | \$ 767,356.00 | | | | |
| | 586.9 | | \$253,186.00 | | 366.8 | \$158,241.25 | \$94,944.75 |

TAB 2

| Bill Date | Staff | Hours | Rate | Billable Amount | Description | Proposed Reduced Hours | Pre-MSJ Final Proposed | Proposed Billable Amount Reductions |
|-----------|-------|-------|-----------|-----------------|--|------------------------|------------------------|-------------------------------------|
| 06/28/23 | LCM | 0.3 | \$ 870.00 | \$ 261.00 | Post trial work. Emails to and from trial team regarding the Econ loss hearing. Review emails from opposing counsel regarding the same. Communications with Holly regarding economic loss hearing. Telephone conference with client regarding economic loss hearing. Emails to and from trial team regarding the same. | 0.15 | | \$130.50 |
| 06/22/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with OC, telephone conference with Laura, File Review. | 0.50 | | \$480.00 |
| 06/21/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Post trial work. Send letter to Judge regarding status of case and econ loss hearing. Review letter from opposing counsel to judge in regards to economic loss hearing. Prep work for econ loss hearing. | 0.5 | | \$435.00 |
| 06/21/23 | SGC | 0.8 | \$ 960.00 | \$ 768.00 | telephone conference with Laura, telephone conference with client. | 0.4 | | \$384.00 |
| 06/14/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Telephone conference with court regarding status of case and next steps. Debrief with trial team regarding call with court. Telephone conference with client regarding the same. | 0.5 | | \$435.00 |
| 06/12/23 | HS | 7.5 | \$ 240.00 | \$ 1,800.00 | Attended trial; post-verdict meeting with client; post-verdict telephone conference with Steve | 3.75 | | \$900.00 |
| 06/12/23 | LCM | 7.5 | \$ 870.00 | \$ 6,525.00 | Jury instructions, deliberation, verdict. Conferences with client and Steve. Review courts order on Plainosmotion for sanctions. | 3.75 | | \$3,262.50 |
| 06/11/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Calls with Steve regarding trial debrief and settlement talks. Communications with Expert regarding trial and Econ lost hearing. | 0.5 | | \$435.00 |
| 06/11/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura, Text to/from Kate | 0.5 | | \$480.00 |
| 06/10/23 | HS | 1 | \$ 240.00 | \$ 240.00 | telephone conference with Steve regarding trial; teams messages with trial team regarding trial | 0.5 | | \$120.00 |
| 06/09/23 | HS | 8 | \$ 240.00 | \$ 1,920.00 | Attended trial; trial prep before and after | 4 | | \$960.00 |
| 06/09/23 | LCM | 12 | \$ 870.00 | \$ 10,440.00 | Trial and preparation before and after. | 6 | | \$5,220.00 |
| 06/08/23 | HS | 13 | \$ 240.00 | \$ 3,120.00 | Attended trial; Trial prep before and after; reviewed and revised Court's proposed jury instructions and verdict sheet; emails and phone calls with Laura regarding same; reviewed admitted exhibits and made index for submission at close of Plaintiff's case in chief | 6.5 | | \$1,560.00 |
| 06/08/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to and from opposing counsel regarding net worth stipulation. | 9 | | \$7,830.00 |
| 06/08/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone conference with Laura; Texts to/from attorneys, Holly and Kate. | 0.5 | | \$480.00 |
| 06/07/23 | HS | 12 | \$ 240.00 | \$ 2,880.00 | Attended trial; trial prep before and after trial | 6 | | \$1,440.00 |
| 06/07/23 | KCO | 10.5 | \$ 520.00 | \$ 5,460.00 | Support and assist lead trial counsel at trial; telephone conference with trial team re strategy for next day; draft cross Camille Hymes and Zeta Smith summaries/goals | 5.25 | | \$2,730.00 |
| 06/07/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to, and from opposing counsel regarding witness order and punitive damages net worth stipulation. Emails to and from Expert regarding econ loss hearing. Review email from opposing counsel regarding defendants response in opposition to motion for sanctions and renewed motion for in limine. | 9 | | \$7,830.00 |
| 06/06/23 | HS | 17 | \$ 240.00 | \$ 4,080.00 | Attended trial; trial prep before and after trial; reviewed surveillance footage produced by Defendant on 6/6; communicated with trial team regarding same; telephone conference with Steve regarding trial | 8.5 | | \$2,040.00 |
| 06/06/23 | KCO | 12 | \$ 520.00 | \$ 6,240.00 | Support and assist lead trial counsel at trial; messages related to late produced videos; review videos | 6 | | \$3,120.00 |

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|----------|-----|------|-----------|--------------|---|------|--|------------|
| 06/06/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to and from opposing counsel regarding Zeta Smith's availability to testify. Review email from opposing counsel regarding new surveillance video. | 9 | | \$7,830.00 |
| 06/05/23 | HS | 12.5 | \$ 240.00 | \$ 3,000.00 | Attended trial; Trial prep before and after trial; legal research regarding mixed-motive standard and Erickson case; drafted letter to Court regarding jury instructions; emails and phone calls with Laura regarding same | 6.25 | | \$1,500.00 |
| 06/05/23 | KCO | 11.1 | \$ 520.00 | \$ 5,772.00 | Support and assist lead trial counsel at trial; review and analyze testimony and documents; continue to draft cross Camille Hymes | 5.55 | | \$2,886.00 |
| 06/05/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. | 9 | | \$7,830.00 |
| 06/04/23 | HS | 12 | \$ 240.00 | \$ 2,880.00 | Drafted motion for sanctions/renewed MIL; telephone conferences with Kate and Laura regarding same; revisions to same; telephone conference with Laura regarding trial strategy | 6 | | \$1,440.00 |
| 06/04/23 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Trial prep; exchange multiple communications with Laura C. Mattiacci, Esquire; exchange multiple communications with client; review, analyze and revise draft motion; multiple telephone conferences with Holly Smith, Esquire regarding same. | 1 | | \$520.00 |
| 06/04/23 | LCM | 14 | \$ 870.00 | \$ 12,180.00 | Trial prep. Final preparation for trial, including finalizing, opening, power, points, evidentiary arguments, cross examinations. Communications with Holly regarding the YouTube video and renewed motion for preclusion. Meeting with Shannon to prepare for direct/cross examination. Communications with Holly regarding motion for sanctions. Review and revise motion to preclude videos, and motion for sanctions. | 7 | | \$6,090.00 |
| 06/03/23 | HS | 4 | \$ 240.00 | \$ 960.00 | Reviewed surveillance videos; legal research for motion for sanctions/renewed MIL | 2 | | \$480.00 |
| 06/03/23 | LCM | 12 | \$ 870.00 | \$ 10,440.00 | Trial prep. Final preparation for trial, including finalizing, opening, power, points, evidentiary arguments, cross examinations. Review and deep digest video clips produced by descendent from surveillance video. | 6 | | \$5,220.00 |
| 06/02/23 | HS | 9.8 | \$ 240.00 | \$ 2,352.00 | Trial prep; met with client and trial team to prep client for her testimony; reviewed video clips; emailed with trial team and Steve Console regarding strategy for motion for sanctions/renewed MIL | 4.9 | | \$1,176.00 |
| 06/02/23 | KCO | 9 | \$ 520.00 | \$ 4,680.00 | In person trial prep with client; prepare client for direct examination; review and analyze late production by Defendant; exchange messages with trial team regarding strategy for dealing with same | 4.5 | | \$2,340.00 |
| 06/02/23 | LCM | 10.5 | \$ 870.00 | \$ 9,135.00 | Trial prep. Emails to and from opposing counsel regarding defendant witness availability. Review and revise timeline. Prep session with plaintiff to go through entire direct and cross examination questions. Review filings by defendant regarding YouTube video. Review email from opposing counsel with numerous clipped versions of surveillance video. | 5.25 | | \$4,567.50 |
| 06/01/23 | HS | 6 | \$ 240.00 | \$ 1,440.00 | Trial prep; reviewed deposition transcripts of Hymes, Smith, and Pinto; reviewed documents; reviewed rebuttal documents; legal research on issues decided at final pretrial conference; prepared for client's prep session | 3 | | \$720.00 |

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|----------|-----|---|-----------|-------------|---|-----|--|------------|
| 06/01/23 | KCO | 4 | \$ 520.00 | \$ 2,080.00 | Trial prep; review and analyze trial exhibits; review and analyze deposition (video and transcript) of Paul Pinto; internal conference regarding trial strategy; telephone conference with expert witness; draft expert direct examination; exchange Teams and text messages with Laura Carlin Mattiacci, Esquire regarding testimony and direct examinations; review and analyze correspondence regarding Zoom link from opposing counsel; review and analyze correspondence from Laura C. Mattiacci, Esquire regarding same | 2 | | \$1,040.00 |
| 06/01/23 | LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Telephone conference with opposing counsel, recording order of witnesses. Emails to and from opposing counsel regarding witness availability. Create list of rebuttal documents, and other needed documents that were not marked as trial exhibits. Continue to work and ever law to review documents produced in the case. communications with Kate regarding examination of experts. Telephone call with Expert regarding trial. Communications with Alexis regarding rebuttal docs and index. Review and revise and send letter to court regarding defendants unilateral request for a zoom link to the trial. | 4.5 | | \$3,915.00 |
| 05/31/23 | LCM | 8 | \$ 870.00 | \$ 6,960.00 | Trial prep. Work on trial subpoena issues. Continue to work on cross-examinations. Emails to and from opposing counsel regarding Camille Hymes and the stamped trial exhibit errors on defendants list. Review email from opposing counsel to Judge regarding synopsis of Angela grass is testimony. Prep session with client. | 4 | | \$3,480.00 |
| 05/30/23 | KCO | 4 | \$ 520.00 | \$ 2,080.00 | Continue to do research and analysis of expert impeachment/rebuttal information; prepare for, travel to/from and attend Joint and Final Pre-trial conference; continue to review and analyze timeline for inclusion in direct examination; | 2 | | \$1,040.00 |
| 05/30/23 | LCM | 8 | \$ 870.00 | \$ 6,960.00 | Trial prep. Prepare for and attend Final Pretrial Conference. Work on creating enlargements for trial, review and revise organizational chart, review and revise other enlargements of key exhibits. Continue to work on cross-examination's and keeks of a list. | 4 | | \$3,480.00 |
| 05/29/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review stamp trial exhibit list by opposing counsel, compare with our list. Continue to review and revise cross examination, opening and closing statement. Review final pretrial conference binder. Communications with trial team regarding call with Expert. Review motion, in limine summaries in preparation for pretrial conference. | 3 | | \$2,610.00 |
| 05/28/23 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Further research and analysis on 701/702 issues; draft memorandum regarding same; team trial strategy messages in Teams | 1 | | \$520.00 |
| 05/28/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting re next steps and trial strategy. | 0.5 | | \$435.00 |
| 05/27/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review and revise direct exam of plaintiff and questions for cross. deposition review of key witnesses for cross-examination and update drafts. | 2.5 | | \$2,175.00 |
| 05/26/23 | HS | 2 | \$ 240.00 | \$ 480.00 | Attended zoom trial prep with client, Kate, and Laura; internal conference with Kate and Laura regarding trial strategy | 1 | | \$240.00 |

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|----------|-----|------|-----------|-------------|---|------|--|------------|
| 05/26/23 | LCM | 10 | \$ 870.00 | \$ 8,700.00 | Trial prep. Review and revise direct outline for plaintiff and rough draft of cross questions/issues. Prep session with client for direct and cross examination. Create binder of rebuttal documents. Communications with trial team regarding Trinsey pay issues. Deeper review of documents not marked at depositions. Internet, research of Holly Hylton alleged racist post, none found. Communications with Kate regarding Holly Hylton's posts. Communications with Kates regarding legal research on hypothetical questions. | 5 | | \$4,350.00 |
| 05/26/23 | SGC | 2.5 | \$ 960.00 | \$ 2,400.00 | Several telephone conference with Laura, Review emails, telephone conference with with Holly. | 1.25 | | \$1,200.00 |
| 05/25/23 | LCM | 10 | \$ 870.00 | \$ 8,700.00 | Trial prep. Continue reading, all documents produced in the case to craft cross examinations. review, and revise direct of plaintiff. Review text messages, and the UTC time translator. Review and revise exhibit list, communications with opposing counsel regarding revised exhibit list. | 5 | | \$4,350.00 |
| 05/24/23 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Trial preparation; review and analyze text messages from exhibit lists; draft chart of same for use at trial; exchange messages with Laura C. Mattiacci, Esquire regarding documents for use at trial; further develop rebuttal arguments | 1 | | \$520.00 |
| 05/24/23 | LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial prep. Review and revise timeline and key exhibit list in preparation for client direct examination prep. | 2 | | \$1,740.00 |
| 05/23/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Communications with Alexis regarding filing of verdict sheet. Communications with trial team regarding preparation for pre-chalk conference. communications with Holly regarding outline of motion in limine arguments. emails, with opposing counsel regarding pretrial filings and preparation for pretrial conference. Work on opening and closing. Communications with Kate regarding text message chart and unemployment compensation application. | 2.5 | | \$2,175.00 |
| 05/22/23 | HS | 11.5 | \$ 240.00 | \$ 2,760.00 | Trial prep Teams meeting; Revised and finalized jury instructions, verdict sheet, and voir dire; Drafted opp to Starbucks' motions in limine; revised same | 5.75 | | \$1,380.00 |
| 05/22/23 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Review, analyze and revise opposition to motion in limine; Teams meeting with Laura C. Mattiacci, Esquire and Holly Smith, Esquire regarding opposition to motion in limine and trial strategy; review and analyze Defendant's opposition to Plaintiff's MIL and Rule 37 motion; coordinate filing of Plaintiff's response to Defendant's motion in limine | 1 | | \$520.00 |
| 05/22/23 | LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Communications with Holly regarding the pretrial documents and legal issues concerning the various jury instructions. Review and revise plaintiff's response to defendants motion in limine. Teams call with Tretina to discuss planus response to defendants motion in limine. Work on cross-examination, opening statement, PowerPoint slides. Emails to and from opposing counsel regarding voir dire and other pretrial filings. | 4.5 | | \$3,915.00 |
| 05/21/23 | LCM | 8.5 | \$ 870.00 | \$ 7,395.00 | Trial prep. Continue to work on key docs for trial. Review and revise cross examinations. Teams meeting with trial team regarding the Sykes/Trinsey trial testimony. Internet research regarding the 911 call another background information concerning the arrests. Review and revise pretrial documents, email pretrial documents to opposing counsel. | 4.25 | | \$3,697.50 |
| 05/20/23 | LCM | 0.5 | \$ 870.00 | \$ 435.00 | Trial prep. Communications with Holly regarding voir dire revisions. | 0.25 | | \$217.50 |
| 05/19/23 | HS | 4.1 | \$ 240.00 | \$ 984.00 | Trial prep teams meeting; Prepped for final pretrial conference; | 2.05 | | \$492.00 |

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|----------|-----|------|-----------|-------------|--|------|--|------------|
| 05/19/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review and revise the verdict sheet, jury instructions, and voir dire. Communications with Holly regarding the same. communications with Holly and Kate regarding the New Jersey "reverse race" SJ standard. Meet and confer with opposing counsel concerning pretrial filings. | 2.5 | | \$2,175.00 |
| 05/18/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review drafts of voir fire, jury instructions, and Verdict sheets. Communications with Holly regarding questions about the jury instructions. Continue working on opening statement, demonstrative exhibits, and PowerPoint. Teams meeting with Trial team regarding pretrial filings. | 2.5 | | \$2,175.00 |
| 05/17/23 | LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial prep. Communications with Alexis and Holly concerning drafts of pretrial filings, verdict sheet, voir dire. | 2 | | \$1,740.00 |
| 05/16/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review, defendants, motion, in limine, and legal research regarding the same. discussions with trial team regarding defendants motion, in limine and other evidentiary issues regarding trial. | 3 | | \$2,610.00 |
| 05/15/23 | HS | 12 | \$ 240.00 | \$ 2,880.00 | Drafted motion in limine; drafted motion to exclude Rose and Grass; revisions to same | 6 | | \$1,440.00 |
| 05/15/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Communications with Holly regarding draft omnibus motion in limine. Communications with Holly regarding defendant's undisclosed witnesses. Legal research regarding MIL issues. Review final motion, in limine packet for filing. | 3 | | \$2,610.00 |
| 05/14/23 | HS | 10.5 | \$ 240.00 | \$ 2,520.00 | Drafted and revised motion to exclude Grass and Rose; Drafted and revised omnibus motion in limine | 5.25 | | \$1,260.00 |
| 05/13/23 | LCM | 5.5 | \$ 870.00 | \$ 4,785.00 | Trial prep. Review all filings concerning defendants motion for reconsideration and the courts denial of the same. Communications with trial team regarding denial of motion for reconsideration. Continue to work on outlines of cross examination of key witnesses. | 2.75 | | \$2,392.50 |
| 05/12/23 | HS | 4.5 | \$ 240.00 | \$ 1,080.00 | Conducted legal research for omnibus motion in limine; drafted omnibus motion in limine | 2.25 | | \$540.00 |
| 05/11/23 | KCO | 0.5 | \$ 520.00 | \$ 260.00 | Trial prep; telephone call with client regarding disability benefits | 0.25 | | \$130.00 |
| 05/10/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Communications regarding motions, in limine with trial team. Legal research and discussions regarding the YouTube clip on defendants exhibit list. Work on draft opening statement. | 2.5 | | \$2,175.00 |
| 05/09/23 | LCM | 2 | \$ 870.00 | \$ 1,740.00 | Trial prep. Teams call regarding motions, in limine, and evidentiary issues concerning trial. Review videos of depts. | 1 | | \$870.00 |
| 05/08/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone call with Laura and emails/text to/from attorneys, Holly and Kate regarding Trial issues and strategy. | 0.25 | | \$240.00 |
| 05/08/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Work on trial subpoena issues. Create drafts of enlargements for trial. Work on timeline and key documents list. Review dep transcripts to prepare crosses. | 3 | | \$2,610.00 |
| 05/05/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Communications with Kate regarding supplemental income loss report. Review supplemental Econ loss report. | 0.5 | | \$435.00 |
| 05/05/23 | LCM | 8 | \$ 870.00 | \$ 6,960.00 | Review email from Kate regarding expert report. Review expert report. Email and telephone conference with Kate regarding expert report. | 4 | | \$3,480.00 |
| 05/04/23 | LCM | 2 | \$ 870.00 | \$ 1,740.00 | Trial prep. Meeting with Holly regarding legal research on the admissibility of Sykes opinion. Continue to work on integrated exhibit and event timeline for trial. | 1 | | \$870.00 |
| 05/03/23 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Trial prep; review exhibits; reviewed expert report and discussed same with Laura C. Mattiacci, Esquire | 1 | | \$520.00 |

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|----------|-----|------|-----------|-------------|--|------|--|------------|
| 05/03/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review all expert reports an expert depositions. Communications with Kate regarding tax gross up. Works on draft exams of experts. Teams meeting regarding trial tasks and next steps. Review trial subpoenas for service. | 2.5 | | \$2,175.00 |
| 05/02/23 | LCM | 7.5 | \$ 870.00 | \$ 6,525.00 | Trial prep. Communications with Alexis regarding re-organizing all text messages in chronological order. Review binder created by Alexis of all text messages, a messages in the case in chronological order. Makes notes for cross- examinations of witnesses. Research regarding Bellevue Communications and Mustafa Rashed. Continue revising Timeline. | 3.75 | | \$3,262.50 |
| 05/01/23 | LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial prep. Communications with Holly regarding pretrial memo. Review and revise the pretrial memo. Review and revise exhibits list. Create list of objections to defendant's exhibits. Communications with trial team regarding Ben Trinsey, Holly Hylton and Paul Sykes. Communications with Kate regarding punitive damages. | 3.5 | | \$3,045.00 |
| 04/30/23 | KCO | 1 | \$ 520.00 | \$ 520.00 | Trial prep; review, analyze and respond to requests from Laura C. Mattiacci, Esquire regarding exhibits | 0.5 | | \$260.00 |
| 04/30/23 | LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Continued review of all documents produced by defendant in the case. Communications to and from Cait regarding the safe and welcoming policy, and other document related questions. | 4.5 | | \$3,915.00 |
| 04/28/23 | LCM | 6.5 | \$ 870.00 | \$ 5,655.00 | Trial prep. Work on pre-trial memo. Communications with Holly regarding pretrial memo. contibue working in docuements. Partial review all of the documents produced by Defendant. | 3.25 | | \$2,827.50 |
| 04/27/23 | LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial prep. Work on witness subpoena issues. Communications with trial team regarding subpoenas. Review and reviseorg, chart for trial. Review LinkedIn profiles of witnesses. Draft parts of crosses for key witnesses. | 3.5 | | \$3,045.00 |
| 04/27/23 | LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial Prep. Work on exhibits list. Call with Holly regarding trial strategy and exhibits. | 2 | | \$1,740.00 |
| 04/26/23 | LCM | 9.1 | \$ 870.00 | \$ 7,917.00 | Trial prep. Create combination exhibit list from defendants, exhibit and plaintiffs, eliminate duplicates, and re-number. Review videos of depositions. | 4.55 | | \$3,958.50 |
| 04/25/23 | LCM | 10.2 | \$ 870.00 | \$ 8,874.00 | Trial prep. Review documents, marked by defendant has trial exhibit, review and revise timeline. Crosscheck documents with deposition testimony. Communications with trial team regarding exhibit lists. | 5.1 | | \$4,437.00 |
| 04/24/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review messages from Holly regarding drafts of her proposed stipulations, dep designations, an exhibit list. Review exchange of trial exhibits. | 3 | | \$2,610.00 |
| 04/20/23 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Review and analyze potential trial exhibits; create proposed exhibit universe; exchange emails with expert | 1 | | \$520.00 |
| 04/18/23 | HS | 1.5 | \$ 240.00 | \$ 360.00 | Teams meeting with Laura and Kate regarding trial strategy and prep; telephone conference with Kate regarding trial tasks and strategy | 0.75 | | \$180.00 |
| 02/22/23 | LCM | 3 | \$ 870.00 | \$ 2,610.00 | Review and revise planus opposition to defendants motion for reconsideration. Internal conference with Holly regarding the same. | 1.5 | | \$1,305.00 |
| 02/07/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura, texts to/from Kate. file review | 0.25 | | \$240.00 |
| 02/03/23 | KCO | 6 | \$ 520.00 | \$ 3,120.00 | Continue to review and analyze record for updated chronology of events; exchange emails with client; Teams messages with trial team; telephone conference with Holly Smith Esquire regarding opposition for motion for reconsideration. | 3 | | \$1,560.00 |

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|----------|-----|-----|-----------|-------------|---|------|--|------------|
| 01/26/23 | LCM | 8 | \$ 870.00 | \$ 6,960.00 | Work on reviewing huge number of the discovery documents, meeting with Alona H., and admin team, regarding organization of documents, teams, communications with Kate and Charlie team regarding tasks and next steps. | 4 | | \$3,480.00 |
| 01/13/23 | KCO | 0.8 | \$ 520.00 | \$ 416.00 | Exchange emails with opposing counsel regarding new trial date; further draft letter and order for submission; review and analyze re-filed motion | 0.4 | | \$208.00 |
| 01/12/23 | KCO | 2.1 | \$ 520.00 | \$ 1,092.00 | Telephone conference with Holly Smith, Esquire regarding response to Rule 11 letter, anticipated new filing and strategy for opposing/responding to same; reveiw, analyze and revise draft proposed order; draft letter to Judge Slomsky; circulate same internally for approval; circulate same to opposing counsel for consent; exchange emails with opposing counsel | 1.05 | | \$546.00 |
| 01/11/23 | KCO | 4.7 | \$ 520.00 | \$ 2,444.00 | Continue to prepare for trial and pre-trial motions/filings by reviewing and analyzing documents produced by either Party in this action; Teams meeting with Trial team to discuss case and trial logistics and strategy | 2.35 | | \$1,222.00 |
| 01/11/23 | LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial team meeting regarding Everlaw, and document organization. Review documents. | 3.5 | | \$3,045.00 |
| 01/10/23 | HS | 5 | \$ 240.00 | \$ 1,200.00 | Everlaw review/organization for trial prep; telephone conference with Kate regarding same; Reviewed motion for reconsideration; research and drafting Rule 11 letter | 2.5 | | \$600.00 |
| 01/10/23 | KCO | 2.8 | \$ 520.00 | \$ 1,456.00 | Exchange multiple emails with client regarding new motion from Defendant and trial scheduling; review, analyze and further draft Rule 11 letter to opposing counsel regarding latest motion; draft and send email enclosing Rule 11 letter to Rich Harris, Esquire; exchange emails with Rich Harris, Esquire regarding same; begin to prepare or pre-trial filings by review, and analyzing record/documents | 1.4 | | \$728.00 |
| 01/10/23 | SGC | 0.6 | \$ 960.00 | \$ 576.00 | emails to/from attys; file review | 0.3 | | \$288.00 |
| 01/09/23 | HS | 7 | \$ 240.00 | \$ 1,680.00 | Reviewed Defendant's motion for reconsideration; legal research on Rule 60; legal research on Erickson and other cases cited in Defendant's motion; emailed with Steve, Kate, and Laura regarding same; telephone conference with Kate regarding same | 3.5 | | \$840.00 |
| 01/09/23 | KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review and analyze motion for reconsideration filed by Defendant; research and analysis of Rule 60; telephone conference with Holly Smith, Esquire regarding strategy for opposition | 0.75 | | \$390.00 |
| 10/25/22 | KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze court order; prepare for and participate in telephone conference with Judge Donio regarding defense request to have client appear remotely; telephone conference with Rich Harris, opposing counsel, regarding settlement; exchange text messages with client regarding settlement conference | 0.5 | | \$260.00 |
| 10/24/22 | KCO | 1 | \$ 520.00 | \$ 520.00 | Exchange texts with Stephen G. Console, Esquire regarding settlement; telephone conference with Stephen G. Console, Esquire regarding settlement; telephone conference with client regarding same | 0.5 | | \$260.00 |
| 10/24/22 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with OV, texts to Kate, telephone conference with Kate, file review | 0.5 | | \$480.00 |
| 10/21/22 | HS | 8 | \$ 240.00 | \$ 1,920.00 | Drafted settlement conference memo; telephone conference with Kate regarding same; revisions to same | 4 | | \$960.00 |
| 10/21/22 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Review and revise and further draft settlement conference memorandum; multiple telephone conferences with Holly Smith, Esquire regarding strategy for settlement conference memorandum; exchange text messages with client regarding settlement conference | 1 | | \$520.00 |

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| 10/17/22 | SGC | 0.8 | \$ 960.00 | \$ 768.00 | emails to/from Kate, texts to/from R, file review | 0.4 | | \$384.00 |
| 09/21/22 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | emails to/from attys, telephone conference with Kate, telephone conference with OC, file review | 0.75 | | \$720.00 |
| 09/20/22 | SGC | 1.6 | \$ 960.00 | \$ 1,536.00 | telephone conferences w Kate, t f , texts to/from RH. Analyze settlement position | 0.8 | | \$768.00 |
| 09/07/22 | SGC | 0.6 | \$ 960.00 | \$ 576.00 | review Ct order, emails to/from attys | 0.3 | | \$288.00 |
| 08/31/22 | HS | 1 | \$ 240.00 | \$ 240.00 | Reviewed SJ opinion; telephone conference with Kate and client regarding same | 0.5 | | \$120.00 |
| 08/31/22 | KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze opinion and order; telephone conference with client regarding same; telephone conference with Stephen G. Console, Esquire regarding same | 0.5 | | \$260.00 |
| 03/28/22 | HS | 3.5 | \$ 240.00 | \$ 840.00 | Prepared for and attended oral argument on Starbucks' SJ motion; phone conferences with Kate before and after same; travel to and from same | 1.75 | \$ 315.00 | \$157.50 |
| 03/27/22 | HS | 2.5 | \$ 240.00 | \$ 600.00 | Prepared for oral argument on Starbucks' SJ motion; intenal communications with Kate regarding same | 1.25 | \$ 225.00 | \$112.50 |
| 01/09/22 | HS | 5.1 | \$ 240.00 | \$ 1,224.00 | Reviewed Defendant's summary judgment reply; reviewed summary judgment record to locate inconsistencies between Defendant's reply and opening brief; drafted motion to file surreply | 2.55 | \$ 459.00 | \$229.50 |
| 01/09/22 | KCO | 1.1 | \$ 520.00 | \$ 572.00 | Review and analyze reply; review and analyze legal issues for sur reply, telephone conference with Holly Smith Esquire regarding same | 0.55 | \$ 214.50 | \$107.25 |
| 12/23/21 | HS | 8 | \$ 240.00 | \$ 1,920.00 | Revised statement of affirmative facts and response to def's facts; reviewed tables and exhibits; finalized summary judgment brief; added cites to record | 4 | \$ 720.00 | \$360.00 |
| 12/23/21 | KCO | 4 | \$ 520.00 | \$ 2,080.00 | Continue to draft opposition to Defendant's 56.1 facts; review, analyze and revise brief in opposition to Defendant's motion for summary judgment; review, analyze and revise affirmative facts; internal conference with Holly Smith, Esquire; | 2 | \$ 780.00 | \$390.00 |
| 12/22/21 | KCO | 6.3 | \$ 520.00 | \$ 3,276.00 | Continue to draft opposition to 56.1 facts; continue to review and analyze legal issues with Holly Smith, Esquire; exchange text messages with client regarding certain facts | 3.15 | \$ 1228.50 | \$614.25 |
| 12/21/21 | KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Continue to work on oppo to 56.1 facts; exchange multiple emails, texts and phone calls with Holly Smith, Esquire regarding opposition and strategy | 1.25 | \$ 487.50 | \$243.75 |
| 12/20/21 | KCO | 6.1 | \$ 520.00 | \$ 3,172.00 | Continue to draft opposition to Defendant's 56.1 facts; exchange multiple emails with Holly Smith, Esquire regarding strategy for brief and facts | 3.05 | \$ 1189.50 | \$594.75 |
| 12/19/21 | HS | 8 | \$ 240.00 | \$ 1,920.00 | Reviewed depositions of Zeta Smith, Shannon B, Sykes, and Trinsey and drafted affirmative facts; drafted summary judgment opposition brief | 4 | \$ 720.00 | \$360.00 |
| 12/11/21 | KCO | 1 | \$ 520.00 | \$ 520.00 | Continue to draft opposition to Defendant's 56.1 facts; begin to draft Plaintiff's affirmative facts | 0.5 | \$ 195.00 | \$97.50 |
| 12/09/21 | KCO | 1.5 | \$ 520.00 | \$ 780.00 | Continue to draft opposition to Defendant's 56.1 facts; internal conference with Holly Smith, Esquire regarding research and analysis of legal issues in Defendant's motion for summary judgment | 0.75 | \$ 292.50 | \$146.25 |
| 12/08/21 | KCO | 7.2 | \$ 520.00 | \$ 3,744.00 | Begin to draft opposition to Defendant's 56.1 facts; internal conference (multiple) with Holly Smith, Esquire regarding analysis of legal issues for brief in opposition to summary judgment | 3.6 | \$ 1404.00 | \$702.00 |
| 11/23/21 | KCO | 3 | \$ 520.00 | \$ 1,560.00 | Prepare for and take expert deposition; telephone conference with opposing counsel regarding same; exchange emails with opposing counsel regarding stipulation | 1.5 | \$ 585.00 | \$292.50 |
| 11/12/21 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | file review, telephone conference with Kate | 0.25 | \$ 180.00 | \$90.00 |

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| 11/11/21 | KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review and analyze Defendant's motion for summary judgment; draft and send email to opposing counsel regarding their errors in filing; draft and send email to opposing counsel regarding their violation of a confidentiality order; | 0.75 | \$ 292.50 | \$146.25 |
| 10/29/21 | KCO | 1.7 | \$ 520.00 | \$ 884.00 | Exchange emails with opposing counsel regarding depositions; file review; exchange emails with client regarding case status and next steps; | 0.85 | \$ 331.50 | \$165.75 |
| 10/07/21 | KCO | 0.4 | \$ 520.00 | \$ 208.00 | Exchange emails with opposing counsel regarding expert deps; draft letter to Judge Slomsky regarding extension; telephone conference with Holly Smith, Esquire regarding same | 0.2 | \$ 78.00 | \$39.00 |
| 07/01/21 | HS | 3 | \$ 240.00 | \$ 720.00 | Revised and finalized reply to motion to compel/for sanctions; internal conferences with Kate regarding same | 1.5 | \$ 270.00 | \$135.00 |
| 06/24/21 | HS | 1 | \$ 240.00 | \$ 240.00 | Reviewed Starbucks' opposition to motion to compel/motion for sanctions; telephone conferences with Kate regarding same | 0.5 | \$ 90.00 | \$45.00 |
| 06/11/21 | KCO | 1.7 | \$ 520.00 | \$ 884.00 | Review and analyze Defendant's document requests to assess responsiveness to requests; draft and send email to client enclosing motion; multiple internal telephone conferences with Holly Smith, Esquire regarding case status and strategy; review and analyze rebuttal economic loss report from Defendant; telephone conference with Stephen G. Console, Esquire regarding Defendant's economic loss report and strategy for addressing same | 0.85 | \$ 331.50 | \$165.75 |
| 06/11/21 | SGC | 0.8 | \$ 960.00 | \$ 768.00 | Emails to and from Kate; telephone conference with Kate regarding expert issues | 0.4 | \$ 288.00 | \$144.00 |
| 06/10/21 | HS | 3.5 | \$ 240.00 | \$ 840.00 | Revised and finalized motion to compel/motion for sanctions; internal conferences with Kate regarding same | 1.75 | \$ 315.00 | \$157.50 |
| 06/10/21 | KCO | 6.2 | \$ 520.00 | \$ 3,224.00 | Review, further draft and revise motion to compel discovery; exchange emails with opposing counsel; draft supporting documents; coordinate filing of motion | 3.1 | \$ 1209.00 | \$604.50 |
| 06/09/21 | HS | 7.5 | \$ 240.00 | \$ 1,800.00 | Drafted motion to compel and motion for sanctions; internal conferences with Kate regarding same | 3.75 | \$ 675.00 | \$337.50 |
| 06/08/21 | HS | 2 | \$ 240.00 | \$ 480.00 | Attended deposition of Zeta Smith; strategy discussions with Kate regarding same | 1 | \$ 180.00 | \$90.00 |
| 06/08/21 | KCO | 3 | \$ 520.00 | \$ 1,560.00 | Prepare for and take deposition of Zeta Smith; exchange emails with opposing counsel regarding withheld document; multiple internal conferences with Holly Smith, Esquire regarding motion; multiple telephone conferences with client regarding case status and strategy | 1.5 | \$ 585.00 | \$292.50 |
| 06/07/21 | HS | 3 | \$ 240.00 | \$ 720.00 | Legal research for motion to compel/motion for sanctions; internal conferences with Kate and law clerk regarding same | 1.5 | \$ 270.00 | \$135.00 |
| 06/04/21 | HS | 2 | \$ 240.00 | \$ 480.00 | Internal conferences with Kate and Steve regarding Sykes' deposition and document withholding; telephone conference with Kate regarding discovery motion | 1 | \$ 180.00 | \$90.00 |
| 06/04/21 | KCO | 3 | \$ 520.00 | \$ 1,560.00 | Telephone conference with Stephen G. Console, Esquire regarding Defendant withholding a document and its discovery during depositions; settlement and case strategy; telephone conference with client regarding same; exchange multiple emails with opposing counsel on withheld documents; internal conference with Haley (law clerk) and Holly Smith, Esquire regarding discovery motion; review and analyze multiple emails between Rich Harris, Esquire and Stephen G. Console, Esquire | 1.5 | \$ 585.00 | \$292.50 |
| 06/04/21 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Kate; emails to and from opposing counsel | 0.75 | \$ 540.00 | \$270.00 |
| 06/02/21 | HS | 1 | \$ 240.00 | \$ 240.00 | Outline and prep documents for Paul Sykes' deposition; telephone conference with Kate regarding same | 0.5 | \$ 90.00 | \$45.00 |

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|----------|-----|-----|-----------|-------------|--|------|-----------|----------|
| 05/27/21 | HS | 1 | \$ 240.00 | \$ 240.00 | internal conference with Kate and Haley; reviewed docs for motion to compel | 0.5 | \$ 90.00 | \$45.00 |
| 05/27/21 | KCO | 3.9 | \$ 520.00 | \$ 2,028.00 | Zoom conference with law clerk regarding research and analysis of legal issues; internal conference with Holly Smith, Esquire and Haley, law clerk, regarding case status and strategy and anticipated motion to the Court; review and analyze documents for expert report; telephone conference with client regarding expert report; exchange emails with expert regarding report; draft and send email to opposing counsel regarding Sykes and Smith depositions | 1.95 | \$ 760.50 | \$380.25 |
| 05/25/21 | KCO | 1.1 | \$ 520.00 | \$ 572.00 | Zoom conference with law clerk and Holly Smith, Esquire regarding research and analysis of legal issue associated with investigation; exchange emails with opposing counsel regarding discovery issues and deadline; finalize and circulate letter to Judge Slomsky seeking extension in fact discovery (only) | 0.55 | \$ 214.50 | \$107.25 |
| 05/22/21 | KCO | 1.6 | \$ 520.00 | \$ 832.00 | Exchange emails with expert economist; exchange multiple emails with opposing counsel regarding discovery dispute on investigative report; exchange emails with Paul Sykes, witness regarding rescheduling of his deposition; review and analyze 2020 financial documents from client and coordinate production of same | 0.8 | \$ 312.00 | \$156.00 |
| 05/21/21 | HS | 5 | \$ 240.00 | \$ 1,200.00 | Attended depositions of Trinsey and Hymes (continued); prepped for same; telephone conferences and text messages with Kate regarding same | 2.5 | \$ 450.00 | \$225.00 |
| 05/21/21 | KCO | 5 | \$ 520.00 | \$ 2,600.00 | Prepare for and take deposition of Ben Trinsey and continued deposition of Camille Hymes; multiple telephone conferences with client; begin to collect and analyze documents for the expert | 2.5 | \$ 975.00 | \$487.50 |
| 05/20/21 | HS | 2 | \$ 240.00 | \$ 480.00 | Outlined and selected documents for depositions of Trinsey and continued deposition of Camille Hymes; internal conferences with Kate regarding same | 1 | \$ 180.00 | \$90.00 |
| 05/17/21 | KCO | 0.9 | \$ 520.00 | \$ 468.00 | Telephone conference with witness Paul Sykes; draft and send email to opposing counsel regarding depositions; draft and send emails to two witnesses regarding depositions; Review and analyze objections to 30b6 designations; exchange text messages with client regarding deposition scheduling | 0.45 | \$ 175.50 | \$87.75 |
| 05/07/21 | KCO | 1.1 | \$ 520.00 | \$ 572.00 | Continue to revise and further draft responses to second set of requests for the production of documents; telephone conference with client regarding same; draft and send email to opposing counsel enclosing responses | 0.55 | \$ 214.50 | \$107.25 |
| 05/06/21 | HS | 1 | \$ 240.00 | \$ 240.00 | Drafted supplemental discovery requests; telephone conversations and text messages with Kate regarding same | 0.5 | \$ 90.00 | \$45.00 |
| 05/06/21 | KCO | 3.8 | \$ 520.00 | \$ 1,976.00 | Exchange emails with opposing counsel regarding discovery disputes; review and revise and further draft second set of discovery responses; exchange multiple texts and emails with client regarding same | 1.9 | \$ 741.00 | \$370.50 |
| 05/04/21 | HS | 4 | \$ 240.00 | \$ 960.00 | Attended depositions of Johnson and Boldizar; multiple phone calls and text exchanges with Kate regarding same | 2 | \$ 360.00 | \$180.00 |
| 05/03/21 | HS | 1.5 | \$ 240.00 | \$ 360.00 | Created outlines and selected/indexed documents for Boldizar and Johnson depositions; email correspondence with Kate regarding same | 0.75 | \$ 135.00 | \$67.50 |
| 05/03/21 | KCO | 0.6 | \$ 520.00 | \$ 312.00 | Exchange emails with opposing counsel regarding discovery dispute; exchange text message with client regarding depositions on Tuesday May 4; telephone conference with Holly Smith, Esquire regarding deposition exhibits and selection of same | 0.3 | \$ 117.00 | \$58.50 |

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|----------|-----|-----|-----------|-------------|---|------|------------|----------|
| 05/02/21 | HS | 1.9 | \$ 240.00 | \$ 456.00 | Created outlines and selected/indexed documents for Boldizar and Johnson depositions; email correspondence with Kate regarding same | 0.95 | \$ 171.00 | \$85.50 |
| 04/26/21 | KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with oc; coordinate filing of letter and stipulation; exchange text messages with client regarding outstanding subs | 0.1 | \$ 39.00 | \$19.50 |
| 04/23/21 | HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter requesting discovery extension; email correspondence with Kate and telephone conference regarding same | 0.25 | \$ 45.00 | \$22.50 |
| 04/23/21 | KCO | 0.4 | \$ 520.00 | \$ 208.00 | Review and revise letter drafted by Holly Smith Esquire regarding discovery extension; draft and send email to opposing counsel enclosing same | 0.2 | \$ 78.00 | \$39.00 |
| 04/21/21 | KCO | 0.8 | \$ 520.00 | \$ 416.00 | Review, analyze and revise subpoenas and letters enclosing same; coordinate service of subpoenas | 0.4 | \$ 156.00 | \$78.00 |
| 04/16/21 | KCO | 1.2 | \$ 520.00 | \$ 624.00 | Telephone conference with opposing counsel to meet and confer on deposition dates and outstanding ESI/preservation issues; draft and send email to client enclosing update | 0.6 | \$ 234.00 | \$117.00 |
| 04/13/21 | KCO | 2.9 | \$ 520.00 | \$ 1,508.00 | Participate in settlement conference before the Hon. Judge Wells; multiple telephone conferences with client and Stephen G. Console, Esquire regarding settlement | 1.45 | \$ 565.50 | \$282.75 |
| 04/13/21 | SGC | 3 | \$ 960.00 | \$ 2,880.00 | Prepare for and attend settlement conference with Kate ; telephone conference with Kate and client; file review | 1.5 | \$ 1080.00 | \$540.00 |
| 04/12/21 | KCO | 2.1 | \$ 520.00 | \$ 1,092.00 | Prepare for settlement conference before the Hon. Judge Wells; multiple telephone conferences with Stephen G. Console, Esquire regarding same; multiple telephone conferences with client regarding same | 1.05 | \$ 409.50 | \$204.75 |
| 04/12/21 | SGC | 2 | \$ 960.00 | \$ 1,920.00 | Prepare for settlement conference; telephone conference with Kate; telephone conference with opposing counsel; emails to from attorneys | 1 | \$ 720.00 | \$360.00 |
| 04/11/21 | KCO | 1.6 | \$ 520.00 | \$ 832.00 | File review; begin to draft settlement conference memorandum; draft and send multiple emails to Stephen G. Console, Esquire regarding settlement conference; exchange multiple texts and emails with client | 0.8 | \$ 312.00 | \$156.00 |
| 04/06/21 | KCO | 0.5 | \$ 520.00 | \$ 260.00 | Review, analyze and respond to email from opposing counsel regarding subpoenas for Trinsey and Sykes; exchange text messages with client regarding same | 0.25 | \$ 97.50 | \$48.75 |
| 04/02/21 | HS | 4.2 | \$ 240.00 | \$ 1,008.00 | Attended deposition of Nathalie Cioffi; multiple telephone conversations and text messages with Kate during and after deposition | 2.1 | \$ 378.00 | \$189.00 |
| 04/02/21 | KCO | 6.7 | \$ 520.00 | \$ 3,484.00 | Prepare for and take deposition of Nathalie Cioffi; draft and send FRCP 45 notice of two subs (Trinsey and Sykes); draft and fax letter to Judge Wells re: settlement conference | 3.35 | \$ 1306.50 | \$653.25 |
| 04/02/21 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Emails to from Kate; telephone conference with Kate | 0.75 | \$ 540.00 | \$270.00 |
| 04/01/21 | HS | 10 | \$ 240.00 | \$ 2,400.00 | Attend Paul Pinto's deposition; telephone conversations with Kate regarding strategy and documents during deposition; prepared outline and document index for Nathalie Cioffi's deposition | 5 | \$ 900.00 | \$450.00 |
| 04/01/21 | KCO | 9 | \$ 520.00 | \$ 4,680.00 | Prepare for and take deposition of Paul Pinto; follow up discussion with client and Holly Smith, Esquire; strategy discussion with Stephen G. Console, Esquire regarding potential liability experts | 4.5 | \$ 1755.00 | \$877.50 |
| 03/31/21 | HS | 4 | \$ 240.00 | \$ 960.00 | Prepared outline and document index for Paul Pinto's deposition; telephone conferences and emails with Kate regarding Pinto deposition | 2 | \$ 360.00 | \$180.00 |
| 03/31/21 | KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Prepare for deposition of Paul Pinto; exchange multiple emails with Holly Smith, Esquire regarding deposition of Paul Pinto and selecting Exhibits for same; review and analyze potential exhibits; telephone conference with client regarding strategy for Pinto Dep | 1.25 | \$ 487.50 | \$243.75 |

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|----------|-----|-----|-----------|-------------|--|------|------------|----------|
| 03/30/21 | KCO | 1.5 | \$ 520.00 | \$ 780.00 | Exchange emails with opposing counsel; begin to prepare for deposition of Paul Pinto | 0.75 | \$ 292.50 | \$146.25 |
| 03/26/21 | KCO | 1.7 | \$ 520.00 | \$ 884.00 | Telephone conference with opposing counsel regarding settlement; review, analyze, revise and further draft second set of document requests; exchange emails with Holly Smith, Esquire regarding litigation tasks | 0.85 | \$ 331.50 | \$165.75 |
| 03/26/21 | SGC | 1.2 | \$ 960.00 | \$ 1,152.00 | Telephone conference with opposing counsel and Kate; telephone conferences with Kate; file review | 0.6 | \$ 432.00 | \$216.00 |
| 03/25/21 | KCO | 0.7 | \$ 520.00 | \$ 364.00 | File review; telephone conference with Holly Smith, Esquire regarding 30b6 deposition notice; draft and send memorandum via email to Stephen G. Console, Esquire providing strategic information regarding upcoming telephone conference with Richard Harris, Esquire opposing counsel | 0.35 | \$ 136.50 | \$68.25 |
| 03/11/21 | KCO | 1 | \$ 520.00 | \$ 520.00 | Exchange emails with opposing counsel regarding depositions; exchange emails with opposing counsel regarding on-going discovery disputes | 0.5 | \$ 195.00 | \$97.50 |
| 03/09/21 | KCO | 2.2 | \$ 520.00 | \$ 1,144.00 | Review and analyze document requests; draft and send communication to opposing counsel regarding deficiencies; draft and send email to Shannon Phillips regarding erratta sheet | 1.1 | \$ 429.00 | \$214.50 |
| 02/03/21 | HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter to clerk regarding pro hac vice fees; correspondence with billing department regarding payment of PHV fees | 0.25 | \$ 45.00 | \$22.50 |
| 01/29/21 | HS | 9.5 | \$ 240.00 | \$ 2,280.00 | Attended Camille Hymes' deposition; multiple telephone conferences with Kate regarding strategy; telephone conference with client and Kate regarding Hymes' deposition | 4.75 | \$ 855.00 | \$427.50 |
| 01/29/21 | KCO | 10 | \$ 520.00 | \$ 5,200.00 | Prepare for and take deposition of Camille Hymes; telephone conference with Holly Smith Esquire (multiple) regarding strategy; telephone conference with client regarding deposition and next steps | 5 | \$ 1950.00 | \$975.00 |
| 01/28/21 | KCO | 6.1 | \$ 520.00 | \$ 3,172.00 | Prepare for deposition of Camille Hymes; review hot docs for selection of dep exhibits; exchange emails with opposing counsel regarding various discovery issues and details for deposition | 3.05 | \$ 1189.50 | \$594.75 |
| 01/27/21 | HS | 9.7 | \$ 240.00 | \$ 2,328.00 | Camille Hymes' deposition dep prep: exhibits and dep outline; Drafted subpoenas for Ebony Johnson, Paul Pinto, and Zeta Smith; prepared 30(b)(6) notice; prepared NOD for Jennifer Frisch and Shannon Boldizar | 4.85 | \$ 873.00 | \$436.50 |
| 01/27/21 | KCO | 6.1 | \$ 520.00 | \$ 3,172.00 | Facetime conference with Stephen G. Console, Esquire regarding strategy; telephone conference with Holly Smith, Esquire regarding method for collecting dep exhibits; review and analyze hot documents for selection as deposition exhibits; draft and send emails to opposing counsel regarding challenge to confidential designation and missing client performance reviews; | 3.05 | \$ 1189.50 | \$594.75 |
| 01/26/21 | KCO | 7.5 | \$ 520.00 | \$ 3,900.00 | Prepare for deposition of Camille Hymes; prepare for and defend deposition of client; multiple telephone conferences with client; telephone conference with Stephen G. Console, Esquire regarding strategy | 3.75 | \$ 1462.50 | \$731.25 |
| 01/25/21 | HS | 3.5 | \$ 240.00 | \$ 840.00 | Client deposition prep | 2.2 | \$ 315.00 | \$157.50 |
| 01/25/21 | KCO | 7.7 | \$ 520.00 | \$ 4,004.00 | Zoom conference with client to prepare for deposition; continue to review and analyze documents produced by Defendant; exchange multiple emails with Holly Smith, Esquire regarding tasks to be completed and depositions | 3.85 | \$ 1501.50 | \$750.75 |
| 01/24/21 | KCO | 4.4 | \$ 520.00 | \$ 2,288.00 | Review documents produced by Defendant; continue to prepare for depositions | 2.2 | \$ 858.00 | \$429.00 |

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|----------|-----|-----|-----------|-------------|---|------|-----------|----------|
| 01/23/21 | KCO | 4.3 | \$ 520.00 | \$ 2,236.00 | Exchange text messages with client regarding dep prep; prepare for depositions; review and analyze documents produced by Defendant | 2.15 | \$ 838.50 | \$419.25 |
| 01/22/21 | KCO | 3.2 | \$ 520.00 | \$ 1,664.00 | Prepare for client's deposition; review and analyze letter from opposing counsel to the court (draft) seeking discovery extension; exchange multiple emails with opposing counsel regarding same; review and revise deposition guide for client; draft and send multiple emails to client enclosing documents in advance of deposition | 1.6 | \$ 624.00 | \$312.00 |
| 01/05/21 | HS | 4.1 | \$ 240.00 | \$ 984.00 | Drafted deficiency letter | 2.6 | \$ 369.00 | \$184.50 |
| 12/01/20 | KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Draft and send letter to opposing counsel for approval before transmitting to Judge Wells; review, analyze and respond to email from opposing counsel regarding depositions; revise revised notices of deposition; draft and send email to opposing counsel enclosing revised notices of deposition; exchange text messages with client | 1.25 | \$ 487.50 | \$243.75 |
| 11/13/20 | KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze email from Judge Wells' Chambers regarding procedures for settlement conference; exchange emails with Stephen G. Console, Esquire and Holly Smith, Esquire regarding settlement conference and strategy; telephone conference with Holly Smith, Esquire regarding discovery strategy and settlement strategy | 0.5 | \$ 195.00 | \$97.50 |
| 10/29/20 | HS | 0.5 | \$ 240.00 | \$ 120.00 | Drafted letter requesting discovery extension | 0.3 | \$ 45.00 | \$22.50 |
| 10/28/20 | HS | 6.5 | \$ 240.00 | \$ 1,560.00 | Reviewed documents produced by Starbucks; prepare hot doc index | 4.1 | \$ 585.00 | \$292.50 |
| 10/27/20 | HS | 8.0 | \$ 240.00 | \$ 1,920.00 | Reviewed documents produced by Starbucks; prepare hot doc index | 5 | \$ 720.00 | \$360.00 |
| 10/27/20 | KCO | 0.2 | \$ 520.00 | \$ 104.00 | Review and analyze emails from Holly Smith, Esquire regarding "hot docs" in Defendant's production; draft and send email to opposing counsel regarding extension letter | 0.1 | \$ 39.00 | \$19.50 |
| 10/26/20 | HS | 8.0 | \$ 240.00 | \$ 1,920.00 | Reviewed documents produced by Starbucks; prepare hot doc index | 5 | \$ 720.00 | \$360.00 |
| 10/21/20 | KCO | 1.5 | \$ 520.00 | \$ 780.00 | Review, analyze and coordinate production of additional documents; exchange multiple emails with opposing counsel regarding discovery extension, depositions and documents; exchange emails with client | 0.75 | \$ 292.50 | \$146.25 |
| 09/21/20 | KCO | 2.2 | \$ 520.00 | \$ 1,144.00 | Review, analyze and respond to deficiency letter from Defendant; exchange text messages with client regarding depositions and return of company property; review and analyze medical index tracker; review and analyze additional documents for production | 1.1 | \$ 429.00 | \$214.50 |
| 09/09/20 | KCO | 0.5 | \$ 520.00 | \$ 260.00 | Exchange emails with Marc Esterow, Esquire (opposing counsel) regarding depositions and scheduling; review and analyze multiple calendars regarding same | 0.25 | \$ 97.50 | \$48.75 |
| 08/22/20 | KCO | 0.5 | \$ 520.00 | \$ 260.00 | Exchange text messages with client regarding HIPAA authorizations; telephone conference with client regarding same | 0.25 | \$ 97.50 | \$48.75 |
| 08/14/20 | KCO | 1 | \$ 520.00 | \$ 520.00 | Review and revise (further) proposed confidentiality agreement; exchange emails with opposing counsel regarding same; exchange emails with opposing counsel regarding deposition dates; exchange text messages with client regarding deposition dates | 0.5 | \$ 195.00 | \$97.50 |
| 08/07/20 | KCO | 0.7 | \$ 520.00 | \$ 364.00 | Telephone conference with Jacqueline Ryan, Esquire regarding documents, deficiency letter and case status/strategy; exchange text messages with client | 0.35 | \$ 136.50 | \$68.25 |
| 08/05/20 | KCO | 1.4 | \$ 520.00 | \$ 728.00 | Exchange additional emails with opposing counsel regarding confidentiality agreement; internal conference via telephone with Stephen G. Console, Esquire regarding case status and strategy | 0.7 | \$ 273.00 | \$136.50 |

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|----------|-----|-----|-----------|-------------|--|------|------------|----------|
| 08/03/20 | KCO | 1.2 | \$ 520.00 | \$ 624.00 | Exchange multiple emails with opposing counsel regarding discovery disputes; telephone conference with opposing counsel regarding discovery disputes; exchange text messages with client regarding deposition dates | 0.6 | \$ 234.00 | \$117.00 |
| 07/30/20 | KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel regarding depositions; exchange emails with client regarding outstanding documents | 0.1 | \$ 39.00 | \$19.50 |
| 07/28/20 | KCO | 4 | \$ 520.00 | \$ 2,080.00 | Review and redline proposed confidentiality stipulation provided by Defendant; draft and send email to opposing counsel enclosing redline; review and analyze proposed stipulation to amend complaint and revise same; draft and send email to opposing counsel enclosing stipulation and proposed amended complaint; draft and send deposition notices to opposing counsel for C. Hymes, P. Pinto, Z. Smith and N. Cioffi; draft and send email to client enclosing Defendant's responses to interrogatories. | 2 | \$ 780.00 | \$390.00 |
| 07/27/20 | KCO | 6.5 | \$ 520.00 | \$ 3,380.00 | Continue to draft responses to document requests; continue to review and analyze client documents for responsiveness; draft and send email to opposing counsel enclosing document requests and provide link to document production; exchange text messages with client regarding outstanding documents | 3.25 | \$ 1267.50 | \$633.75 |
| 07/24/20 | KCO | 6.2 | \$ 520.00 | \$ 3,224.00 | Continue to draft responses to document requests; continue to review and tag for production client documents; telephone conference with client regarding text messages | 3.1 | \$ 1209.00 | \$604.50 |
| 07/23/20 | KCO | 2.7 | \$ 520.00 | \$ 1,404.00 | Continue to review client documents and select same for production as responsive to requests; telephone conference with client regarding certain ESI | 1.35 | \$ 526.50 | \$263.25 |
| 07/21/20 | KCO | 2.8 | \$ 520.00 | \$ 1,456.00 | Continue to draft discovery responses; exchange emails with client regarding same; draft and send email to opposing counsel serving RFA responses; coordinate services of ROG responses; begin to draft document request responses | 1.4 | \$ 546.00 | \$273.00 |
| 07/20/20 | KCO | 6 | \$ 520.00 | \$ 3,120.00 | Continue to draft discovery responses; exchange multiple emails with client regarding same; | 3 | \$ 1170.00 | \$585.00 |
| 07/17/20 | KCO | 2.4 | \$ 520.00 | \$ 1,248.00 | Continue to draft discovery responses; telephone conference with client about ESI collection; coordinate ESI collection; exchange emails with opposing counsel regarding discovery response time | 1.2 | \$ 468.00 | \$234.00 |
| 07/16/20 | KCO | 5 | \$ 520.00 | \$ 2,600.00 | Begin to draft discovery responses; exchange multiple emails and text messages with client regarding same; exchange emails with opposing counsel regarding discovery response deadline and confidentiality agreement | 2.5 | \$ 975.00 | \$487.50 |
| 06/17/20 | KCO | 1 | \$ 520.00 | \$ 520.00 | Telephone conference with Judge Slomsky regarding transfer of case to him; exchange emails with opposing counsel regarding scheduling order; telephone conference with Jacqueline Ryan, Esquire regarding case status and assignments | 0.5 | \$ 195.00 | \$97.50 |
| 05/28/20 | KCO | 1.2 | \$ 520.00 | \$ 624.00 | Review, analyze and respond to multiple emails from client regarding discovery and deadlines; review, analyze and respond to email from opposing counsel regarding ESI; review and revise proposed confidentiality order; exchange emails with opposing counsel regarding same | 0.6 | \$ 234.00 | \$117.00 |

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|--------------|-----|-------------|-----------|---------------------|---|------|------------|---------------------|
| 04/06/20 | KCO | 2 | \$ 520.00 | \$ 1,040.00 | Draft initial disclosures; draft initial discovery requests; draft and send email to opposing counsel enclosing same; telephone conference with Stephen G. Console, Esquire regarding case status and strategy; exchange emails with opposing counsel regarding improper contact by Starbucks attorney with Shannon; exchange emails with opposing counsel regarding stipulation to file second amended complaint | 1 | \$ 390.00 | \$195.00 |
| 02/24/20 | KCO | 0.6 | \$ 520.00 | \$ 312.00 | Draft and send email to client; review and analyze Court's ruling; review and analyze Judge's policies and procedures to determine when the Defendant's responsive pleading is due; draft and send email to opposing counsel regarding same | 0.3 | \$ 117.00 | \$58.50 |
| 02/11/20 | KCO | 5.2 | \$ 520.00 | \$ 2,704.00 | Review and analyze second letter from Defendant to the Hon. Renee Marie Bumb; research and analyze legal issues related to motion to dismiss of a race discrimination claim; draft opposition letter for the Court in response to Defendant's letter seeking partial motion to dismiss; finalize letter and coordinate filing with the Court | 2.6 | \$ 1014.00 | \$507.00 |
| 01/09/20 | KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Draft amended complaint; review, analyze and research issues raised by two letters to court (motion to transfer, motion to dismiss) by Defendant; telephone conference with client; internal conference with Anna D. Norman, Esquire regarding motion to transfer research | 1.25 | \$ 487.50 | \$243.75 |
| 11/05/19 | KCO | 0.4 | \$ 520.00 | \$ 208.00 | Review and analyze email from opposing counsel to Stephen G. Console, Esquire; Internal conference with Stephen G. Console, Esquire; telephone conference with client; waivers to opposing counsel | 0.2 | \$ 78.00 | \$39.00 |
| 11/05/19 | SGC | 1 | \$ 960.00 | \$ 960.00 | Email to and from opposing counsel; internal conference with Kate; file review; telephone conference with client and Kate | 0.5 | \$ 360.00 | \$180.00 |
| 10/30/19 | KCO | 1 | \$ 520.00 | \$ 520.00 | Telephone conference with Stephen G. Console, Esquire regarding case status and strategy; draft and send text to client; draft and send email to opposing counsel regarding service waivers | 0.5 | \$ 195.00 | \$97.50 |
| 10/30/19 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | Internal conference with a Kate; review file | 0.15 | \$ 108.00 | \$54.00 |
| 10/29/19 | KCO | 0.5 | \$ 520.00 | \$ 260.00 | File review for service related issues; draft and send email to client regarding judge assignment and in person meeting | 0.25 | \$ 97.50 | \$48.75 |
| 10/28/19 | KCO | 2.7 | \$ 520.00 | \$ 1,404.00 | Continue to draft complaint; telephone conference with client regarding same; exchange multiple emails with Laura C. Mattiacci, Esquire regarding revisions to complaint; coordinate filing of same | 1.35 | \$ 526.50 | \$263.25 |
| 10/24/19 | KCO | 2.5 | \$ 520.00 | \$ 1,300.00 | Review and analyze client documents, timeline, charge of discrimination; begin to draft complaint; telephone conference with Stephen G. Console, Esquire regarding venue; voicemail to client | 1.25 | \$ 487.50 | \$243.75 |
| 06/11/19 | KCO | 1 | \$ 520.00 | \$ 520.00 | Review and analyze file to prepare for telephone conference with with client; telephone conference with with Emily Derstine Friesen, Esquire and client regarding case status and strategy. | 0.5 | \$ 195.00 | \$97.50 |
| 06/27/18 | SGC | 0.6 | \$ 960.00 | \$ 576.00 | Internal conference with Emily Derstine Friesen, Esquire; telephone conference with opposing counsel | 0.3 | \$ 216.00 | \$108.00 |
| 06/20/18 | SGC | 0.6 | \$ 960.00 | \$ 576.00 | Internal conference with Emily Derstine Friesen, Esquire; voice mail - opposing counsel | 0.3 | \$ 216.00 | \$108.00 |
| 05/22/18 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Review and revise draft Charge; internal conference with Emily Derstine Friesen, Esquire | 0.75 | \$ 540.00 | \$270.00 |
| TOTAL | | 1002 | | \$573,839.00 | | | | \$236,397.00 |

TAB 3

| Bill Date | Staff | Hours | Rate | Billable Amount | Description | Proposed Vague Reductions (Hours) | Proposed Billable Amount | Proposed Billable Amount Post Reduction |
|-----------|-------|-------|-----------|-----------------|---|-----------------------------------|--------------------------|---|
| 06/22/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with OC, telephone conference with Laura, File Review. | 1 | \$960.00 | \$0.00 |
| 06/21/23 | SGC | 0.8 | \$ 960.00 | \$ 768.00 | telephone conference with Laura, telephone conference with client. | 0.8 | \$768.00 | \$0.00 |
| 06/16/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura. | 1 | \$960.00 | \$0.00 |
| 06/14/23 | SGC | 0.7 | \$ 960.00 | \$ 672.00 | telephone conference with Laura. | 0.7 | \$672.00 | \$0.00 |
| 06/12/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura. | 0.5 | \$480.00 | \$0.00 |
| 06/11/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura, Text to/from Kate | 1 | \$960.00 | \$0.00 |
| 06/10/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with Laura. | 1 | \$960.00 | \$0.00 |
| 06/08/23 | SGC | 1 | \$ 960.00 | \$ 960.00 | Telephone conference with Laura; Texts to/from attorneys, Holly and Kate. | 1 | \$960.00 | \$0.00 |
| 06/07/23 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Laura re. Trial. | 1.5 | \$1,440.00 | \$0.00 |
| 06/06/23 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Holly. | 0.2 | \$192.00 | \$0.00 |
| 06/05/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone conference with Laura. | 0.5 | \$480.00 | \$0.00 |
| 06/02/23 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | Texts to/from Laura. | 0.3 | \$288.00 | \$0.00 |
| 06/01/23 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Laura. | 1.5 | \$1,440.00 | \$0.00 |
| 05/31/23 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone call with Laura. | 1.5 | \$1,440.00 | \$0.00 |
| 05/30/23 | SGC | 2 | \$ 960.00 | \$ 1,920.00 | File Review | 2 | \$1,920.00 | \$0.00 |
| 05/26/23 | SGC | 2.5 | \$ 960.00 | \$ 2,400.00 | Several telephone conference with Laura, Review emails, telephone conference with with Holly. | 2.5 | \$2,400.00 | \$0.00 |
| 05/25/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura | 0.5 | \$480.00 | \$0.00 |
| 05/16/23 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | File review. | 0.3 | \$288.00 | \$0.00 |
| 05/15/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone conference with Laura. | 0.5 | \$480.00 | \$0.00 |
| 04/25/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | Telephone conference with Kate. | 0.5 | \$480.00 | \$0.00 |
| 03/30/23 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Holly | 0.2 | \$192.00 | \$0.00 |
| 02/07/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Laura, texts to/from Kate. file review | 0.5 | \$480.00 | \$0.00 |
| 02/02/23 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | emails to/from attys | 0.2 | \$192.00 | \$0.00 |
| 01/31/23 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 01/14/23 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Kate | 0.5 | \$480.00 | \$0.00 |
| 01/10/23 | SGC | 0.6 | \$ 960.00 | \$ 576.00 | emails to/from attys; file review | 0.6 | \$576.00 | \$0.00 |
| 01/05/23 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Laura | 0.3 | \$288.00 | \$0.00 |
| 11/17/22 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | emails to/from Kate , file review | 0.2 | \$192.00 | \$0.00 |
| 10/26/22 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conferences w Kate, file review | 1 | \$960.00 | \$0.00 |
| 10/24/22 | SGC | 1 | \$ 960.00 | \$ 960.00 | telephone conference with OV, texts to Kate, telephone conference with Kate, file review | 1 | \$960.00 | \$0.00 |
| 10/20/22 | SGC | 0.4 | \$ 960.00 | \$ 384.00 | telephone conference with Kate | 0.4 | \$384.00 | \$0.00 |
| 10/17/22 | SGC | 0.8 | \$ 960.00 | \$ 768.00 | emails to/from Kate, texts to/from R, file review | 0.8 | \$768.00 | \$0.00 |
| 09/16/22 | SGC | 0.4 | \$ 960.00 | \$ 384.00 | telephone conference with Kate (9/15) | 0.4 | \$384.00 | \$0.00 |

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| 09/01/22 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Holly | 0.3 | \$288.00 | \$0.00 |
| 08/31/22 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Kate | 0.5 | \$480.00 | \$0.00 |
| 08/05/22 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 03/29/22 | SGC | 0.6 | \$ 960.00 | \$ 576.00 | telephone conference with Kate | 0.6 | \$576.00 | \$0.00 |
| 03/28/22 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 11/23/21 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | telephone conference with Kate | 0.5 | \$480.00 | \$0.00 |
| 11/22/21 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 11/18/21 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | internal conference with Kate | 0.5 | \$480.00 | \$0.00 |
| 11/12/21 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | file review, telephone conference with Kate | 0.5 | \$480.00 | \$0.00 |
| 06/08/21 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 06/04/21 | SGC | 1.5 | \$ 960.00 | \$ 1,440.00 | Telephone conference with Kate; emails to and from opposing counsel | 1.5 | \$1,440.00 | \$0.00 |
| 05/28/21 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 05/21/21 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | Telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 02/19/21 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | File review | 0.2 | \$192.00 | \$0.00 |
| 01/27/21 | SGC | 2 | \$ 960.00 | \$ 1,920.00 | telephone conference with Kate | 2 | \$1,920.00 | \$0.00 |
| 11/30/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Emails to and from Kate | 0.2 | \$192.00 | \$0.00 |
| 10/07/20 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | Telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 10/02/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Holly | 0.2 | \$192.00 | \$0.00 |
| 09/29/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 09/24/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 09/11/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Jacquelyn Ryan | 0.2 | \$192.00 | \$0.00 |
| 08/05/20 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 07/27/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 07/20/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Emails to and from Jacquelyn Ryan | 0.2 | \$192.00 | \$0.00 |
| 04/14/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 04/09/20 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 04/06/20 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 01/06/20 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | Telephone conference with Kate | 0.3 | \$288.00 | \$0.00 |
| 11/04/19 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Emails to and from Kate | 0.2 | \$192.00 | \$0.00 |
| 10/24/19 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Telephone conference with Kate | 0.2 | \$192.00 | \$0.00 |
| 11/01/18 | SGC | 0.1 | \$ 960.00 | \$ 96.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.1 | \$96.00 | \$0.00 |
| 07/25/18 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.2 | \$192.00 | \$0.00 |
| 06/25/18 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Voice mail - opposing counsel | 0.2 | \$192.00 | \$0.00 |
| 06/18/18 | SGC | 0.4 | \$ 960.00 | \$ 384.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.4 | \$384.00 | \$0.00 |
| 06/04/18 | SGC | 0.3 | \$ 960.00 | \$ 288.00 | File review; review article | 0.3 | \$288.00 | \$0.00 |
| 05/23/18 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | Internal conference with Emily Derstine Friesen, Esquire; file review | 0.5 | \$480.00 | \$0.00 |
| 05/21/18 | SGC | 0.5 | \$ 960.00 | \$ 480.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.5 | \$480.00 | \$0.00 |

| | | | | | | | | |
|--------------|-----|-----------|-----------|----------------------|--|-----------|--------------------|---------------------|
| 05/18/18 | SGC | 0.2 | \$ 960.00 | \$ 192.00 | Internal conference with Emily Derstine Friesen, Esquire | 0.2 | \$192.00 | \$0.00 |
| 04/26/23 | KCO | 1.4 | \$ 520.00 | \$ 728.00 | Trial Prep teams meeting | 1.4 | \$728.00 | \$0.00 |
| 01/31/23 | KCO | 1.9 | \$ 520.00 | \$ 988.00 | Trial prep | 1.9 | \$988.00 | \$0.00 |
| 08/03/21 | KCO | 1.3 | \$ 520.00 | \$ 676.00 | Contiue to prepare for depositions | 1.3 | \$676.00 | \$0.00 |
| 10/02/20 | KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel | 0.2 | \$104.00 | \$0.00 |
| 10/01/20 | KCO | 0.2 | \$ 520.00 | \$ 104.00 | Exchange emails with opposing counsel | 0.2 | \$104.00 | \$0.00 |
| 05/09/23 | HS | 3 | \$ 240.00 | \$ 720.00 | Multiple trial prep Teams meetings | 3 | \$720.00 | \$0.00 |
| 05/02/23 | HS | 1 | \$ 240.00 | \$ 240.00 | Trial prep teams meeting | 1 | \$240.00 | \$0.00 |
| 04/26/23 | HS | 1.5 | \$ 240.00 | \$ 360.00 | Trial prep teams meeting | 1.5 | \$360.00 | \$0.00 |
| 04/24/23 | HS | 5 | \$ 240.00 | \$ 1,200.00 | Drafted materials for exchange with Defendant | 5 | \$1,200.00 | \$0.00 |
| 04/21/23 | HS | 5 | \$ 240.00 | \$ 1,200.00 | Drafted materials for exchange with Defendant | 5 | \$1,200.00 | \$0.00 |
| 06/03/21 | HS | 1.5 | \$ 240.00 | \$ 360.00 | Attended Paul Sykes' deposition | 1.5 | \$360.00 | \$0.00 |
| Total | | 61 | | \$ 755,272.00 | | 61 | \$43,160.00 | \$712,112.00 |

TAB 4

| Bill Date | Staff | Hours | Rate | Billable Amount | Description | Proposed Excessive Reductions (Hours) | Proposed Billable Amount Reductions | Proposed Billable Amount Post Reduction |
|-----------|-------|-------|-----------|-----------------|---|---------------------------------------|-------------------------------------|---|
| 06/09/23 | LCM | 12 | \$ 870.00 | \$ 10,440.00 | Trial and preparation before and after. | 4.00 | \$3,480.00 | \$6,960.00 |
| 06/08/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to and from opposing counsel regarding net worth stipulation. | 6.00 | \$5,220.00 | \$10,440.00 |
| 06/07/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to, and from opposing counsel regarding witness order and punitive damages net worth stipulation. Emails to and from Expert regarding econ loss hearing. Review email from opposing counsel regarding defendants response in opposition to motion for sanctions and renewed motion for in limine. | 6.00 | \$5,220.00 | \$10,440.00 |
| 06/06/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. Emails to and from opposing counsel regarding Zeta Smith's availability to testify. Review email from opposing counsel regarding new surveillance video. | 6.00 | \$5,220.00 | \$10,440.00 |
| 06/05/23 | LCM | 18 | \$ 870.00 | \$ 15,660.00 | Trial and preparation before and after. | 6.00 | \$5,220.00 | \$10,440.00 |
| 05/26/23 | LCM | 10 | \$ 870.00 | \$ 8,700.00 | Trial prep. Review and revise direct outline for plaintiff and rough draft of cross questions/issues. Prep session with client for direct and cross examination. Create binder of rebuttal documents. Communications with trial team regarding Trinsey pay issues. Deeper review of documents not marked at depositions. Internet, research of Holly Hylton alleged racist post, none found. Communications with Kate regarding Holly Hylton's posts. Communications with Kates regarding legal research on hypothetical questions. | 3.33 | \$2,900.00 | \$5,800.00 |
| 05/18/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review drafts of voir fire, jury instructions, and Verdict sheets. Communications with Holly regarding questions about the jury instructions. Continue working on opening statement, demonstrative exhibits, and PowerPoint. Teams meeting with Trial team regarding pretrial filings. | 1.67 | \$1,450.00 | \$2,900.00 |
| 05/10/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Communications regarding motions, in limine with trial team. Legal research and discussions regarding the YouTube clip on defendants exhibit list. Work on draft opening statement. | 1.67 | \$1,450.00 | \$2,900.00 |
| 05/08/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Work on trial subpoena issues. Create drafts of enlargements for trial. Work on timeline and key documents list. Review dep transcripts to prepare crosses. | 2.00 | \$1,740.00 | \$3,480.00 |
| 05/05/23 | LCM | 8 | \$ 870.00 | \$ 6,960.00 | Review email from Kate regarding expert report. Review expert report. Email and telephone conference with Kate regarding expert report. | 2.67 | \$2,320.00 | \$4,640.00 |
| 05/04/23 | LCM | 2 | \$ 870.00 | \$ 1,740.00 | Trial prep. Meeting with Holly regarding legal research on the admissibility of Sykes opinion. Continue to work on integrated exhibit and event timeline for trial. | 0.67 | \$580.00 | \$1,160.00 |
| 05/03/23 | LCM | 5 | \$ 870.00 | \$ 4,350.00 | Trial prep. Review all expert reports an expert depositions. Communications with Kate regarding tax gross up. Works on draft exams of experts. Teams meeting regarding trial tasks and next steps. Review trial subpoenas for service. | 1.67 | \$1,450.00 | \$2,900.00 |
| 05/02/23 | LCM | 7.5 | \$ 870.00 | \$ 6,525.00 | Trial prep. Communications with Alexis regarding re-organizing all text messages in chronological order. Review binder created by Alexis of all text messages, a messages in the case in chronological order. Makes notes for cross- examinations of witnesses. Research regarding Bellevue Communications and Mustafa Rashed. Continue revising Timeline. | 2.50 | \$2,175.00 | \$4,350.00 |
| 05/01/23 | LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial prep. Communications with Holly regarding pretrial memo. Review and revise the pretrial memo. Review and revise exhibits list. Create list of objections to defendant's exhibits. Communications with trial team regarding Ben Trinsey, Holly Hylton and Paul Sykes. Communications with Kate regarding punitive damages. | 2.33 | \$2,030.00 | \$4,060.00 |
| 04/30/23 | LCM | 9 | \$ 870.00 | \$ 7,830.00 | Trial prep. Continued review of all documents produced by defendant in the case. Communications to and from Cait regarding the safe and welcoming policy, and other document related questions. | 3.00 | \$2,610.00 | \$5,220.00 |
| 04/28/23 | LCM | 6.5 | \$ 870.00 | \$ 5,655.00 | Trial prep. Work on pre-trial memo. Communications with Holly regarding pretrial memo. contibue working in docuements. Partial review all of the documents produced by Defendant. | 2.17 | \$1,885.00 | \$3,770.00 |
| 04/27/23 | LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial prep. Work on witness subpoena issues. Communications with trial team regarding subpoenas. Review and reviseorg, chart for trial. Review LinkedIn profiles of witnesses. Draft parts of crosses for key witnesses. | 2.33 | \$2,030.00 | \$4,060.00 |
| 04/27/23 | LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial Prep. Work on exhibits list. Call with Holly regarding trial strategy and exhibits. | 1.33 | \$1,160.00 | \$2,320.00 |
| 04/26/23 | LCM | 9.1 | \$ 870.00 | \$ 7,917.00 | Trial prep. Create combination exhibit list from defendants, exhibit and plaintiffs, eliminate duplicates, and re-number. Review videos of depositions. | 3.03 | \$2,639.00 | \$5,278.00 |

| | | | | | | | | |
|--------------|-----|--------------|-----------|---------------------|--|--------------|--------------------|---------------------|
| 04/25/23 | LCM | 10.2 | \$ 870.00 | \$ 8,874.00 | Trial prep. Review documents, marked by defendant has trial exhibit, review and revise timeline. Crosscheck documents with deposition testimony. Communications with trial team regarding exhibit lists. | 3.40 | \$2,958.00 | \$5,916.00 |
| 04/25/23 | LCM | 4 | \$ 870.00 | \$ 3,480.00 | Trial Prep. Work on exhibits list. | 1.33 | \$1,160.00 | \$2,320.00 |
| 04/24/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Trial prep. Review messages from Holly regarding drafts of her proposed stipulations, dep designations, an exhibit list. Review exchange of trial exhibits. | 2.00 | \$1,740.00 | \$3,480.00 |
| 04/20/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Review potential trial exhibit list. Messages to and from trial team regarding exhibit list. | 0.33 | \$290.00 | \$580.00 |
| 04/19/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Review dep exhibits in Everlaw. | 0.33 | \$290.00 | \$580.00 |
| 04/18/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with trial teams reading tasks and next steps. | 0.33 | \$290.00 | \$580.00 |
| 04/04/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with Trial team regarding tasks and next steps. Review SJ briefs. | 0.33 | \$290.00 | \$580.00 |
| 03/30/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Review exhibit list, pretrial orders, pleadings. | 0.33 | \$290.00 | \$580.00 |
| 03/07/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with Trial team regarding tasks and next steps. | 0.33 | \$290.00 | \$580.00 |
| 03/03/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Teams meeting with Trial Team regarding state of Everlaw documents. | 0.33 | \$290.00 | \$580.00 |
| 02/28/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Work in Timelines, review potential trial exhibits. | 0.33 | \$290.00 | \$580.00 |
| 02/23/23 | LCM | 0.5 | \$ 870.00 | \$ 435.00 | Review and revise plaintiffs opposition to the defendants motion for reconsideration. | 0.17 | \$145.00 | \$290.00 |
| 02/22/23 | LCM | 3 | \$ 870.00 | \$ 2,610.00 | Review and revise planus opposition to defendants motion for reconsideration. Internal conference with Holly regarding the same. | 1.00 | \$870.00 | \$1,740.00 |
| 02/21/23 | LCM | 0.5 | \$ 870.00 | \$ 435.00 | Case review meeting with trial team. | 0.17 | \$145.00 | \$290.00 |
| 02/15/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Weekly trial team meeting regarding strategy, tasks and next steps. | 0.33 | \$290.00 | \$580.00 |
| 02/09/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Trial prep. Quick review of videotaped depositions. Notes for trial presentation. | 0.33 | \$290.00 | \$580.00 |
| 02/03/23 | LCM | 6 | \$ 870.00 | \$ 5,220.00 | Read deposition transcripts, draft initial outline for cross examinations. | 2.00 | \$1,740.00 | \$3,480.00 |
| 01/26/23 | LCM | 8 | \$ 870.00 | \$ 6,960.00 | Work on reviewing huge number of the discovery documents, meeting with Alona H., and admin team, regarding organization of documents, teams, communications with Kate and Charlie team regarding tasks and next steps. | 2.67 | \$2,320.00 | \$4,640.00 |
| 01/12/23 | LCM | 0.5 | \$ 870.00 | \$ 435.00 | Emails to and from Kate regarding letter to opposing counsel concerning shifting trial dates. Review and revise letter to opposing counsel. | 0.17 | \$145.00 | \$290.00 |
| 01/11/23 | LCM | 7 | \$ 870.00 | \$ 6,090.00 | Trial team meeting regarding Everlaw, and document organization. Review documents. | 2.33 | \$2,030.00 | \$4,060.00 |
| 01/10/23 | LCM | 1 | \$ 870.00 | \$ 870.00 | Begin reviewing file, timelines, common or chart. | 0.33 | \$290.00 | \$580.00 |
| 11/22/22 | LCM | 1 | \$ 870.00 | \$ 870.00 | Teams meeting to discuss trial tasks and strategy. | 0.33 | \$290.00 | \$580.00 |
| 10/29/19 | LCM | 1.2 | \$ 870.00 | \$ 1,044.00 | Review all docs in trial binder. Review and revise complaint. Internal conference with Kate regarding complaint. Internal conference with Steve regarding complaint. | 0.40 | \$348.00 | \$696.00 |
| 10/28/19 | LCM | 1 | \$ 870.00 | \$ 870.00 | Review trial binder. Emails to and from Kate regarding complaint. | 0.33 | \$290.00 | \$580.00 |
| Total | | 235.0 | | \$204,450.00 | | 78.33 | \$68,150.00 | \$136,300.00 |

EXHIBIT 2

SHANNON PHILLIPS

v.

**STARBUCKS CORPORATION D/B/A STARBUCKS
COFFEE COMPANY**

Report and Exhibit

June 9, 2021

Shannon Phillips v. Starbucks Corporation d/b/a Starbucks Coffee Company

1.0 INTRODUCTION

Forensic Resolutions, Inc. has prepared this report of our findings in the above-captioned matter. You requested that we analyze documents and information related to Shannon Phillips' claim for an economic loss. Stephen Scherf, CPA/CFF, CFE of Asterion prepared Ms. Phillips' economic loss estimate. Our analysis of Mr. Scherf's report and our estimate of Ms. Phillips' economic loss, if any, are contained in this report.

2.0 BACKGROUND

Shannon Phillips was terminated from her employment with Starbucks Corporation ("Starbucks") on May 9, 2018. Ms. Phillips has filed suit against Starbucks alleging her termination was due to racial discrimination and retaliation.

Ms. Phillips was employed by Starbucks since December 12, 2005 and was promoted to Regional Director in 2011. According to the Second Amended Complaint, Ms. Phillips managed operations for approximately 100 stores in the Pennsylvania, Southern New Jersey, Delaware and Maryland area, specifically including a store in Philadelphia where two black men were arrested on April 12, 2018. Ms. Phillips alleges she was terminated by Starbucks in connection with the April 2018 incident and as a result of racial discrimination and retaliation. Her Amended Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC") dated May 22, 2018¹ states, "I was terminated because I am white... I was terminated because I complained of and objected to race discrimination." At her deposition on January 26, 2021, Ms. Phillips was asked, "So you never complained that you were being discriminated against based on your race while you were an employee. Is that fair?" to which she replied, "Yes, that's fair."²

According to Ms. Phillips' deposition testimony, she did not recall her annual compensation at Starbucks, but estimated her base salary totaled approximately \$250,000 and then she had bonus potential and stock options. She specifically testified, "...I also received stock options every year as a regional director... they were vesting. So I had a lot of stock potential as well. That was taken away when I was let go."³ According to records from Starbucks⁴, Ms. Phillips' base salary totaled \$167,503 annually effective November 27, 2017, after she received a 3% merit increase.

¹ Exhibit 1 of Amended Complaint.

² Ms. Phillips' deposition dated January 26, 2021, page 83.

³ Ms. Phillips' deposition dated January 26, 2021, page 195.

⁴ PHILLIPS00755.

According to a letter from Raymour & Flanigan (“Raymour”), dated August 7, 2018, Ms. Phillips was offered employment as “Regional in Training” to start on August 13, 2018 with a pay plan of \$155,000 annually and bonus opportunity. According to Answers to Interrogatories, Ms. Phillips’ title is “Regional Director of Sales” and her pay plan increased to \$157,000 annually in January 2020. She testified she received another pay plan increase to \$160,000 annually in January 2021. The Answers to Interrogatories state, “...she is paid on commission of how the stores actually perform.”⁵

We have not been provided with any documentation or testimony regarding Ms. Phillips’ job search efforts. The Answers to Interrogatories state, “...Victor Huetz, former Regional Vice President of Starbucks recommended her to [Raymour] for a position. A recruiter from [Raymour] reached out to her via LinkedIn, and ultimately, Plaintiff was hired... While Plaintiff was taking the NJ Unemployment provided course, she was contacted by [Raymour], in or about early July 2018, or weeks after her termination.”⁶

According to the W-2 Wage and Tax Statements provided, Ms. Phillips’ earnings for the years 2016 through 2020 totaled:

| | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> | <u>2020</u> |
|----------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| Starbucks | \$266,709 | \$281,292 | \$81,262 | N/A | N/A |
| Raymour ⁷ | <u>N/A</u> | <u>N/A</u> | <u>\$56,647</u> | <u>\$144,966</u> | <u>\$151,513</u> |
| Total | <u>\$259,793</u> | <u>\$281,292</u> | <u>\$137,909</u> | <u>\$144,966</u> | <u>\$151,513</u> |

The Answers to Interrogatories state Ms. Phillips received unemployment compensation during the period in which she was out of work in 2018. We have not been provided with any information and/or documentation regarding the amount of unemployment compensation that she actually received.

According to Ms. Phillips’ LinkedIn profile, she attended Otterbein University; however, we have not been provided with any information regarding what degree, if any, she obtained. She is divorced, has two children and lives in Woolwich, New Jersey.

Ms. Phillips has filed suit against Starbucks and is claiming an economic loss, among other damages.

⁵ Answers to Interrogatories, page 4, Interrogatory Answer #2.

⁶ Answers to Interrogatories, page 4, Interrogatory Answer #2.

⁷ The W-2 Wage and Tax Statements provided list the employer name as “Raymours Furniture Co. Inc.”; however, for purposes of our report, we will solely refer to this entity as Raymour.

3.0 DOCUMENTS REVIEWED

Our analysis is based upon the following documents:

- Second Amended Complaint with attached Exhibits 1 and 2;
- Economic reports prepared by Mr. Scherf, dated May 28, 2021 and June 4, 2021;
- Deposition testimony transcript of Ms. Phillips, dated January 26, 2021;
- Various bates stamped documents including:
 - Ms. Phillips' W-2 Wage and Tax Statements for the years 2016 through 2020 (PHILLIPS00142, PHILLIPS00722 through PHILLIPS00728, PHILLIPS00731 through PHILLIPS00734 and PHILLIPS00757);
 - Offer letter from Raymour, dated August 7, 2018 (PHILLIPS00730);
 - Letter from Starbucks regarding Special Equity Award, dated February 16, 2018 (PHILLIPS00141 and PHILLIPS00759);
 - Fidelity Investments Report for April 2018 (PHILLIPS00033 through PHILLIPS00044);
 - Documentation regarding Starbucks Compensation (PHILLIPS00753 through PHILLIPS00756 and PHILLIPS00758)⁸;
 - Starbucks Safe & Welcoming Policy Information (PHILLIPS00131 through PHILLIPS00134); and
- Research of various industry and government publications, as referenced in our report.

We have not been provided with Ms. Phillips' tax returns for any year, any records regarding her unemployment compensation or any records regarding her job search following her termination from Starbucks. These records are important to our analysis of her alleged economic loss.

Our report is subject to change if additional information or documentation becomes available.

4.0 CLAIMED LOSS

Mr. Scherf calculated a loss of earnings and fringe benefits to Ms. Phillips as a result of her May 2018 termination assuming she incurred a permanent diminution in her earning capacity as a result of her alleged racial discrimination and retaliation. His report states, "For purposes of my analysis, I have assumed liability on the part of Defendant and as such offer no opinions on liability."⁹

Mr. Scherf estimated Ms. Phillips' pre-termination earning capacity to total \$289,730 annually in 2018 values, based on her actual earnings at Starbucks for 2017, the full year prior to her termination, and assuming a 3% merit increase. He increased his pre-

⁸ These documents are not fully legible.

⁹ Mr. Scherf's report dated June 4, 2021, page 1.

termination earning capacity estimate by 3% annually to current, 2021 values totaling \$316,596 annually.

Mr. Scherf estimated Ms. Phillips' post-termination earning capacity to total \$146,456 annually in 2020 values, based on her actual reported earnings in 2020 from Raymour. He increased his post-termination earning capacity estimate by 6% annually, based on the increase of her earnings from 2019 to 2020, to current, 2021 values totaling \$155,244 annually.

Mr. Scherf increased his estimate of Ms. Phillips' lost earnings for fringe benefits. He calculated losses of medical premiums, 401(k) contributions and nonvested stock grants. Mr. Scherf estimated lost fringe benefits for medical premiums to total \$1,900 annually¹⁰, based on information in Answers to Interrogatories and "...based upon difference in Employer provided healthcare per W-2s."¹¹ He estimated lost 401(k) contributions on Ms. Phillips' pre-termination earnings from Starbucks to total 2% of earnings, based on her historical contribution totaling 4%, according to her W-2 Wage and Tax Statements, and assuming a 50% employer-paid matching contribution. Additionally, Mr. Scherf included a loss of stocks totaling \$180,418 in 2018, based on the value of her stock plan from Starbucks as of April 30, 2018, according to the investment report from Fidelity Investments.¹²

Mr. Scherf commenced his calculations as of May 10, 2018 (i.e., the day after Ms. Phillips' termination) and continued calculating losses through June 30, 2021 (i.e., a period of approximately three and a half years). He also prepared calculations of Ms. Phillip's future lost earnings from July 1, 2021 through December 31, 2031 (i.e., a period of 10.5 years) and his report states, "I have not provided a specific time-period for this determination and have provided cumulative amounts by year. I have left the issue of the period of damages to the trier of fact."¹³

Mr. Scherf applied future growth of 3% annually for Starbucks earnings (i.e., pre-termination earnings) and 6% annually for Raymour earnings (i.e., post-termination earnings), which is consistent with the growth rates utilized in his past loss calculations, as previously discussed. Mr. Scherf discounted future losses to present value by 1.29%, based on the 10-year treasury yield as of May 21, 2021.

¹⁰ Mr. Scherf included a full year of loss during 2018 (i.e., the year of her termination from Starbucks).

¹¹ Mr. Scherf's report dated June 4, 2021, Exhibit 1, footnote 4.

¹² PHILLIPS00033 through PHILLIPS00044.

¹³ Mr. Scherf's report dated June 4, 2021, page 4.

Mr. Scherf estimated Ms. Phillips' loss of earnings and fringe benefits to total \$739,758, as shown on Exhibit 1. Additionally, although not stated in the conclusion of his report, Mr. Scherf calculated Ms. Phillips' future loss of earnings to range from \$84,246 to \$1,626,443, depending on the assumed period of future loss (i.e., July 1, 2021 through December 31, 2021 or July 1, 2021 through December 31, 2031), as shown on Exhibit 2 of his report.

5.0 FORENSIC RESOLUTIONS, INC. ANALYSIS

Our analysis of Mr. Scherf's report, along with our analysis of the available documents and information, indicates several flaws resulting in an overstatement of the loss estimates presented in his report. These flaws include assuming Ms. Phillips incurred a permanent diminution in her earning capacity as a result of her termination and alleged racial discrimination and retaliation without sufficient basis, utilizing flawed and overstated lost fringe benefits estimates, and utilizing understated earnings from Raymour, among others, as discussed below.

Flawed Assumption of Permanent Diminution in Earning Capacity

The calculations presented by Mr. Scherf are flawed for assuming Ms. Phillips has incurred a loss of earning capacity as a result of her termination from Starbucks and alleged racial discrimination and retaliation. Mr. Scherf's analysis assumes Ms. Phillips' earning capacity has been limited to the amount that she earns at Raymour since that is the employment she obtained following her termination from Starbucks. There is no basis to assume that Ms. Phillips' earning capacity and/or vocational horizons were limited to the position she obtained at Raymour solely as a result of being terminated by Starbucks and/or the alleged racial discrimination and retaliation. Mr. Scherf has not provided any vocational, medical or other expert opinion for his assumption that Ms. Phillips incurred a loss of earning capacity/permanent diminution in her earning capacity as a result of her termination and/or the alleged racial discrimination and retaliation.

According to the American Institute of Certified Public Accountants ("AICPA") Practice Aid, *Measuring Damages Involving Individuals*, "Earning capacity... is based upon earnings that an individual could earn, considering the individual's education, training, and experience, whether or not the individual is ever engaged in such employment."¹⁴ This publication further explains that earning capacity is based on a person's ability to earn money given the person's talent, skills, training and experience. We have not been provided with any vocational, medical or other expert report precluding Ms. Phillips from

¹⁴ AICPA Practice Aid, *Measuring Damages Involving Individuals*, page 17.

employment, disabling her in any way, or documenting a decrease in her ability to earn wages. It is speculative to assume that any decrease in her earnings is solely as a result of the alleged racial discrimination and retaliation related to her termination from Starbucks.

Mr. Scherf's analysis assumes Ms. Phillips is limited to her employment with Raymour and associated earnings. It is speculative to assume that Ms. Phillips was limited to this employer/compensation level solely as a result of the alleged racial discrimination and retaliation. We have not been provided with any documentation or testimony regarding Ms. Phillips' job search efforts. The Answers to Interrogatories state, "...Victor Huetz, former Regional Vice President of Starbucks recommended her to [Raymour] for a position. A recruiter from [Raymour] reached out to her via LinkedIn, and ultimately, Plaintiff was hired... While Plaintiff was taking the NJ Unemployment provided course, she was contacted by [Raymour], in or about early July, 2018, or weeks after her termination."¹⁵ Therefore, it is our understanding that Ms. Phillips took a course through the New Jersey Unemployment office related to updating her resume and learning skills to perform a job search, but obtained a job through the efforts of others (i.e., Mr. Huetz and Raymour's recruiter) and may not have performed any independent job search and/or may not have applied to any other jobs. We question if Ms. Phillips' post-termination earnings were limited as a result of her not seeking employment with any other employer and solely accepting a position with Raymour.

Additionally, Ms. Phillips' actual reported earnings at Raymour in the years 2019 and 2020 (i.e., the two full years following her termination from Starbucks) were less than her pay plan. As previously discussed, Ms. Phillips' pay plan totaled \$155,000 in 2019 and \$157,000 in 2020; however, her actual reported gross pay totaled \$144,966 in 2019 and \$151,513 in 2020. Therefore, Ms. Phillips' actual earnings were approximately 94% and approximately 97% of her pay plans at Raymour in the years 2019 and 2020, respectively. Based on the foregoing, Ms. Phillips did not reach her pay plan compensation in either of the two full years following her termination from Starbucks and the decrease in her actual earnings versus her pay plan is unrelated to the alleged racial discrimination and retaliation related to her termination from Starbucks.

Based on the foregoing, Mr. Scherf's calculations of Ms. Phillips' lost earnings are flawed and unsupported for assuming she incurred a permanent diminution in her earning capacity as a result of the alleged racial discrimination and retaliation as well as her termination from Starbucks.

¹⁵ Answers to Interrogatories, page 4, Interrogatory Answer #2.

Flawed and Overstated Fringe Benefits

Mr. Scherf's estimates of Ms. Phillips' lost fringe benefits, specifically employer-paid health insurance and stock plans, appear flawed and overstated, as discussed in greater detail below.

Health Insurance

As previously discussed, Mr. Scherf estimated a loss in the difference of employer-paid health insurance totaling \$1,900 annually and appears to have calculated a full year of loss during the year 2018 (i.e., the year of Ms. Phillips' termination from Starbucks). Mr. Scherf has not provided any explanation of the basis for his inclusion of lost health insurance and his Exhibit 1 solely states, "Estimated based upon difference in Employer provided healthcare per W-2s. See also, Answers to Interrogatories."¹⁶ We cannot reconcile the amount included in Mr. Scherf's report with the documentation provided.

An individual can experience a loss of health insurance in two ways, either by losing coverage or by incurring additional costs for such coverage. We have not been provided with any documentation and/or testimony regarding any specific time period in which Ms. Phillips did not have health insurance coverage following her termination from Starbucks. We also have not been provided with any documentation and/or testimony regarding any additional costs that Ms. Phillips has incurred to replace such coverage.

According to the W-2 Wage and Tax Statements provided and the Answers to Interrogatories, Ms. Phillips receives health insurance coverage with Raymour (i.e., her post-termination employer); however, she claims they are "diminished" from Starbucks. We also have not been provided with any information and/or document regarding any additional costs that Ms. Phillips has incurred. It is unsupported to calculate a loss in the difference of the employer's cost, if any, and Ms. Phillips' economic loss should be limited to the additional money, if any, she spends for health insurance coverage or the amount she incurred to replace her health insurance during any period in which she lost employer-paid coverage.

Stock Plans

As previously discussed, Mr. Scherf included a loss of stocks totaling \$180,418 in 2018, based on the value of her stock plan from Starbucks as of April 30, 2018, according to the investment report from Fidelity Investments.¹⁷ Mr. Scherf has not provided any

¹⁶ Mr. Scherf's report dated June 4, 2021, Exhibit 1, footnote 4.

¹⁷ PHILLIPS00033 through PHILLIPS00044.

explanation regarding why he has included this amount as an economic loss to Ms. Phillips as a result of her termination from Starbucks.

According to our analysis of the aforementioned investment report, the stock plan value of \$180,418 as of April 30, 2018 was comprised of:

| | |
|---|-------------------------|
| Stock Options (4,867 shares) | \$19,035 |
| Restricted Stock Units ("RSUs") (2,178 shares) | 125,373 |
| Performance Awards (926 target shares) | 35,981 |
| Individual Account Value (dividends & interest) | <u>29</u> |
| Total Holdings | <u>\$180,418</u> |

Mr. Scherf's assumptions are flawed and his calculations are overstated for including a loss of stocks/account value for which Ms. Phillips was fully vested prior to her termination. For example, the \$29 individual account value should not be included as an economic loss as that value would have remained with Ms. Phillips after her termination. Additionally, our analysis indicates Ms. Phillips had been vested in 1,758 shares of the stock options, which had a value of \$5,962 (i.e., approximately 31% of the stock option value and approximately 36% of the shares). Therefore, Mr. Scherf's fringe benefits estimate related to stocks is overstated by at least \$5,991 since Ms. Phillips had vested in these stocks and therefore, she would not have lost these stock options as a result of her termination.

Additionally, we question why Mr. Scherf has included a loss of stock options since these items only have value to Ms. Phillips if she elects to purchase the stock, and their value varies based on the stock market. For example, the Fidelity Investment report shows 1,902 shares of stock options that were granted to Ms. Phillips on November 16, 2015 had no value as of April 30, 2018 since the grant price exceeded the price per share. We question the reasonableness of assuming that solely but for her termination in May 2018 that Ms. Phillips would have vested 100% in these options and exercised these options at the value they had on April 30, 2018, which is what Mr. Scherf has effectively assumed.

Furthermore, Mr. Scherf's assumptions are flawed and his calculations are overstated for failing to adequately consider the vesting of RSUs and the achievement of performance awards since he has included 100% of the value of such stock plan components in his estimate of Ms. Phillips' economic loss, as discussed in greater detail below.

According to a letter from Starbucks dated February 16, 2018, Ms. Phillips was awarded a "Special Equity Award" of RSUs and this letter states, "The RSUs will vest over four years: 50% on the second anniversary of the grant date and the remaining 50% on the fourth anniversary, in each case subject to your continued employment with Starbucks."¹⁸ This

¹⁸ PHILLIPS00141.

letter is specifically referenced in the footnote on Mr. Scherf's report regarding his inclusion of stock totaling \$180,418; however, he has failed to adequately consider the vesting schedule in his loss estimate. As previously discussed, Mr. Scherf's calculation of Ms. Phillips' economic loss totaling \$739,758 is for the period of May 10, 2018 through June 30, 2021, as shown on Exhibit 1 of his report. The Fidelity Investments report shows the grant dates for RSUs to have been November 15, 2017, February 15, 2018 and April 16, 2018¹⁹. Therefore, assuming RSUs take four years to be 100% vested, none of these RSUs, which are valued at \$125,373, would be 100% vested during the loss period of Mr. Scherf's report. Based on the foregoing, we question why Mr. Scherf assumed that Ms. Phillips incurred a total loss of such benefits solely as a result of her May 2018 termination.

Regarding performance awards valued at \$35,981, the Fidelity Investments report shows this is comprised of shares related to grant dates of November 16, 2015 and November 21, 2016. The grant of performance award on November 16, 2015 was for performance through October 1, 2017 and had target shares of 445; however, Ms. Phillips achieved only 144 shares or approximately 32% of her target. The valuation of performance awards totaling \$35,981 considers only the shares that Ms. Phillips actually achieved for the November 16, 2015 grant date; however, the performance award granted on November 21, 2016 was for performance through September 30, 2018 (i.e., the performance period was still in progress) so the total target shares were included in the valuation. Mr. Scherf's calculations are flawed for assuming that Ms. Phillips would achieve all of the target shares for the November 21, 2016 grant when she had not done so in the past. The value of performance award granted on November 21, 2016 totaled \$27,691; therefore, assuming performance at her previously demonstrated rate of approximately 32% of the target shares, her actual value of this performance award may have only been \$8,861, or \$18,830 less than the amount included in Mr. Scherf's estimate of her lost fringe benefits for stock plans.

Based on the foregoing, Mr. Scherf's estimates of Ms. Phillips' lost fringe benefits, specifically related to health insurance and stock plans, are flawed and overstated, which overstates his estimate of her economic loss.

¹⁹ PHILLIPS00040.

Understated Raymour Earnings

Our analysis of Ms. Phillips' W-2 Wage and Tax Statements from Raymour for the years 2018 through 2020 indicates Mr. Scherf has understated these earnings in his calculations, which overstates his estimate of Ms. Phillips' economic loss.

As shown on page 2 of our report, Ms. Phillips' earnings from Raymour totaled \$56,647 in 2018, \$144,966 in 2019 and \$151,513 in 2020 – these amounts are based on the gross pay reported on her W-2 Wage and Tax Statements. Mr. Scherf's report includes Ms. Phillips' earnings from Raymour to total \$55,591 in 2018, \$138,096 in 2019 and \$146,456 in 2020 – these amounts are based on the taxable earnings reported on her W-2 Wage and Tax Statements. Therefore, the amounts utilized in Mr. Scherf's report are \$12,983 less than Ms. Phillips' reported gross pay (i.e., differences of \$1,056 in 2018, \$6,870 in 2019 and \$5,057 in 2020). We have not been provided with any information and/or explanation regarding why Mr. Scherf would utilize a taxable level of earnings instead of gross pay.

Additionally, as a result of utilizing Ms. Phillips' taxable earnings versus her gross pay, Mr. Scherf has understated his estimates of her post-termination (i.e., Raymour) earning capacity beginning in 2021. As previously discussed, Mr. Scherf estimated Ms. Phillips' post-termination earning capacity to total \$155,244 annually, based on her 2020 earnings increased by 6%, which is based on the increase from her 2019 to 2020 earnings. Based on Ms. Phillips' actual gross pay for the years 2019 and 2020, her earnings increased by 4.5% and therefore, her estimated post-termination earning capacity under Mr. Scherf's methodology would total \$158,331 annually in 2021 values (i.e., 2020 earnings of \$151,513 annually, increased by 4.5%). Therefore, Mr. Scherf understated his post-termination earning capacity estimate by \$3,087 annually in 2021 values.

Based on the foregoing, Mr. Scherf's estimates of Ms. Phillips' economic loss are overstated as a result of utilizing incorrect actual post-termination earnings for the years 2018 through 2020 and understated estimates of her post-termination earning capacity.

Discount Rate

As previously discussed, Mr. Scherf utilized future growth of 3% annually and 6% annually for pre-termination (Starbucks) and post-termination (Raymour) earnings, respectively, and utilized a discount rate of 1.29%. Therefore, Mr. Scherf effectively applied net growth rates of 1.71% and 4.71% in his calculations.

Federal Court Title VII Instructions discuss present value discounting and state, "You must also reduce any award to its present value by considering the interest that [plaintiff] could earn on the amount of the award if [he/she] made a relatively risk-free investment. You

must make this reduction because an award of an amount representing future loss of earnings is more valuable to [plaintiff] if [he/she] receives it today than if it were received at the time in the future when it would have been earned.”²⁰ Therefore, the Federal Court Title VII Instructions specifically indicate that present value discounting of future losses is required and while Mr. Scherf did identify a present value discount rate, he has effectively applied net growth rates and therefore, did not discount losses to present value.

By failing to discount future losses to present value, Mr. Scherf’s estimates of Ms. Phillips’ future economic loss ranging from \$84,246 to \$1,626,443 are flawed and overstated.

Other Issues

Mr. Scherf’s report does not reference interviewing Ms. Phillips and does not reference reviewing her tax returns for any year. His report also does not reference any information and/or documentation regarding Ms. Phillips’ job search following her termination from Starbucks. We question if Mr. Scherf’s evaluation of Ms. Phillips’ loss of earnings following her termination from Starbucks is complete without reviewing such information.

Additionally, the information provided indicates Ms. Phillips worked from home, but did significant travel in connection with her employment at Starbucks. The Second Amended Complaint states, “Plaintiff’s schedule/routine was such that she worked from her home office on Mondays and Fridays and visited her direct reports in their stores in southern New Jersey, Delaware, Maryland and Pennsylvania on Tuesdays, Wednesdays and Thursdays.”²¹ We question if Ms. Phillips incurred any unreimbursed expenses in connection with her employment. These unreimbursed expenses would have been reported on her tax returns and should be utilized as an offset to any claimed loss of earnings from Starbucks. The Federal Court Title VII Instructions specifically state, “You must reduce any award by the amount of the expenses that [plaintiff] would have incurred in making those earnings.”²² Therefore, the Federal Court Title VII Instructions specifically reference making a reduction for unreimbursed expenses incurred with employment.

Based on the foregoing, Mr. Scherf’s calculations regarding Ms. Phillips’ lost earnings appear flawed and overstated.

Based on our analysis of the documents and information provided, we have determined alternate estimates of Ms. Phillips’ economic loss.

²⁰ Section 5.4.4 Title VII Damages – Front Pay, page 88.

²¹ Second Amended Complaint, paragraph 25 (page 5).

²² Section 5.4.3 Title VII Damages – Back Pay, page 82.

5.1 Loss of Earnings

We have calculated Ms. Phillips' economic loss under two separate scenarios, one assuming she incurred no loss of earnings as a result of her termination from Starbucks and one assuming she incurred a temporary, past loss of earnings as a result of her termination from Starbucks, as discussed in more detail below. There is no basis to calculate any future loss of earnings to Ms. Phillips given the lack of supporting vocational, medical or other expert opinions indicating that her earning capacity was permanently impaired as a result of her termination from Starbucks and the alleged racial discrimination and retaliation.

In Scenario 1, we have not calculated any loss of earnings to Ms. Phillips as a result of her termination from Starbucks. There is insufficient basis to calculate any loss of earnings to Ms. Phillips as a result of alleged racial discrimination and retaliation. We have not been provided with any expert report, which affirmatively opines that Ms. Phillips was wrongfully terminated from Starbucks and/or that she was terminated as a result of alleged racial discrimination and retaliation.

As previously discussed, Ms. Phillips testified that she never claimed that she was discriminated on based on her race during her employment with Starbucks. According to Answers to Interrogatories, "...Plaintiff states that she is not aware of any racist statements or comments made about Caucasian people by anyone in Partner Resources or above her in the "Starbucks hierarchy.""²³ Her Amended Charge of Discrimination with the EEOC dated May 22, 2018²⁴ states, "I was terminated because I am white... I was terminated because I complained of and objected to race discrimination." However, this document further states, "Linda Johnson (white), Regional Director, has taken over my job duties and responsibilities."²⁵ At her deposition, Ms. Phillips was asked, "...do you know who replaced you in your position?" to which she replied, "My area was kind of broken up. So Marcus [Eckensberger], who was an existing regional director, took the two districts in Philadelphia."²⁶ She also testified that Linda Johnson "...ultimately took the balance of my region..."²⁷ Ms. Phillips further testified that Mr. Eckensberger and Ms. Johnson are both white/Caucasian. We question the reasonableness of assuming Ms. Phillips was terminated as a result of racial discrimination when she was replaced with employees of the same race, according to her own testimony.

²³ Answers to Interrogatories, page 9, Interrogatory Answer #10.

²⁴ Exhibit 1 of Amended Complaint.

²⁵ Ibid.

²⁶ Ms. Phillips' deposition dated January 26, 2021, page 132.

²⁷ Ms. Phillips' deposition dated January 26, 2021, page 133.

Based on the foregoing, we have not calculated any loss of earnings to Ms. Phillips as a result of her termination from Starbucks in Scenario 1.

Alternatively, in Scenario 2, we calculated a temporary loss of earnings and fringe benefits to Ms. Phillips following her termination from Starbucks. We calculated a loss for the period of May 9, 2018 (i.e., the date of Ms. Phillips' termination from Starbucks) through August 13, 2018 (i.e., the date she obtained employment with Raymour), a period of approximately 14 weeks, based on the period of time that Ms. Phillips was actually unemployed.

This loss period of approximately 14 weeks is supported by statistical duration of unemployment, according to our independent research. According to data in the *Economic Report of the President, 2020*²⁸, the median duration of unemployment in 2018 was approximately nine weeks and the average duration of unemployment in 2018 was approximately 23 weeks. The *Economic Report of the President, 2020* further indicates that approximately 64% of the individuals who were unemployed during 2018 were unemployed for a period of 14 weeks or less.

We estimated Ms. Phillips' pre-termination earning capacity to total \$289,730 annually in 2018 values, based on her actual earnings in the year 2017 (i.e., the full year prior to her termination from Starbucks) and assuming a 3% increase, consistent with Mr. Scherf's estimate and methodology. This estimate may be conservative given Ms. Phillips' base salary during the year of her termination totaled \$167,503, as previously discussed, and considering that her actual 2018 pre-termination earnings would annualize to \$232,177.

We increased our estimate of Ms. Phillips' pre-termination earnings for lost fringe benefits, specifically employer-paid 401(k) contributions, totaling 4% of gross earnings. Our estimate is based on Ms. Phillips' W-2 Wage and Tax Statements for the years 2017 and 2018 showing her individual contribution of approximately 4% and Answers to Interrogatories, which indicated Starbucks matched 100% of the first 6% of an employee's 401(k) contributions.

We have not calculated any loss regarding fringe benefits related to employer-paid health insurance or related to stock plans. As previously discussed, there is insufficient basis to calculate losses of either of these types of fringe benefits based on the documentation and information provided.

We have not applied any future growth or present value discounting as we have calculated a temporary, past loss only. As previously discussed, there is no basis to calculate any loss

²⁸ Table B-28. Unemployment by duration and reason, 1975-2019.

beyond the date that Ms. Phillips returned to full-time employment given the lack of expert opinion that her earning capacity was impaired as a result of her termination from Starbucks and/or the alleged racial discrimination and retaliation.

Based on the foregoing, our estimate of Ms. Phillips' loss of earnings and fringe benefits, after all adjustments, totals no loss in Scenario 1 and \$78,343 in Scenario 2, as shown on Exhibit 1.

6.0 CONCLUSION

Based on the documents and information provided, our estimate of Ms. Phillips' loss of earnings and fringe benefits, after all adjustments, totals no loss in Scenario 1 and \$78,343 in Scenario 2, as shown on Exhibit 1.

My firm is being compensated for the work performed in this matter based upon the time spent at my hourly rate, which is \$375 per hour. Assistance provided by staff members of my firm is being billed at rates ranging from \$75 to \$300 per hour and is also based upon the time spent.

We express these opinions to a reasonable degree of accounting and economic certainty.

We reserve the right to update our report if additional documentation or information becomes available.

Howard M. Silverstone /lw

Howard M. Silverstone, MBE, CPA, CFF, FCA, CFE
June 9, 2021

Jessica L. Vrooman

Jessica L. Vrooman, CPA
June 9, 2021

HMS/jlv

SHANNON PHILLIPS v. STARBUCKS CORPORATION d/b/a **Exhibit 1**

STARBUCKS COFFEE COMPANY

Summary of Shannon Phillips' Estimated Economic Loss

Date of Termination: May 9, 2018

I. Estimated Earnings Loss

| | Per Mr. Scherf | Per Forensic Resolutions, Inc. | |
|--|-------------------|-----------------------------------|------------------|
| Scenario [Note 1]: | 1 | 1 | 2 |
| Pre-Termination Earning Capacity (2018 values): | \$289,730 | N/A | \$289,730 |
| Post-Termination Earning Capacity (2020 values): | \$146,456 | N/A | N/A |
| Fringe Benefits (Health Insurance): | \$1,900 | N/A | [Note 4] |
| Fringe Benefits (Retirement): | 2% | N/A | 4% |
| Fringe Benefits (Stock Plan): | [Note 2] | N/A | [Note 4] |
| Date Loss Ends: | June 30, 2021 | N/A | August 13, 2018 |
| PAST LOSS | | | |
| Estimated Pre-Termination Earnings | \$ 951,427 | \$ - | \$ 75,330 |
| Less: Actual / Estimated Post-Termination Earnings | (417,765) | - | - |
| Plus: Fringe Benefits - Health Insurance | 6,650 | - | - |
| Plus: Fringe Benefits - Retirement | 19,029 | - | 3,013 |
| Plus: Fringe Benefits - Stock Plan | 180,418 | - | - |
| TOTAL PAST LOSS | \$ 739,759 | No Loss | \$ 78,343 |
| | [Note 3] | | |

Notes:

- 1 - We have solely shown Mr. Scherf's past loss calculation, which is consistent with his conclusion; however, as discussed in our report, he also prepared future loss calculations, which ranged from \$84,246 to \$1,626,443 depending on the assumed period of loss.
- 2 - Mr. Scherf has solely included this amount as a one-time fringe benefit during the year 2018 (i.e., the year of her termination)
- 3 - There is a \$1 difference due to rounding.
- 4 - We have not been provided with sufficient information to include lost fringe benefits for health insurance and stocks, as discussed in greater detail in our report.